TSD File Inventory Index

Date: March 2, 2000

Initial: CMGeneras

Facility Name: Union Camp Corporation (Ontario Division - ... site)

Facility Identification Number: OHD 004 166 336

A.1 General Correspondence	X	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	X
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total 7

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		**D.5 Corrective Action/Enforcement**	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		**E. Boilers and Industrial Furnaces (BIF)**	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		**F.1 Imagery/Special Studies** (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
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.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
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.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folders per schedule.

Public Participation

UNITED \TES ENVIRONMENTAL PROTECTION 3ENCY
REGION V

DATE: October 5, 1982

SUBJECT: Union Camp Corp./ Closure Plan
OHD004166336

FROM: Barbara Russell
RAIU

TO: Elizabeth Utley
STU #2

This memorandum is to inform you that the public comment period pertaining to Union Camp Corp. ended on October 4, 1982. No public comments were received in regard to the closure of Union Camp Corp. plnat in Solon, Ohio.

cc: Part A File
State Log

file copied out

5HW-TUB

AUG 26 1982

Mr. F.A. Manfredonia
Manufacturing Manager
Union Camp Corporation
6225 Camp Industrial Road
Solon, Ohio 44139

RE: OHD044166336
Union Camp Corporation
Solon, Ohio

Dear Mr. Manfredonia:

This office has received the closure plan for your drum storage area.

Before this Agency can issue final approval, we are required to issue public notice of closure and to consider any comments on the manner in which closure will be completed. Publin Notice should appear in the Times Register of Bedford, Ohio approximately September 2, 1982, the date of the notice will commence a 30-day comment period.

A draft copy of the public notice is attached for your information. Please note that in order to facilitate public understanding, we are proposing that a copy of the closure plan be available at the Solon Public Library during regularly scheduled business hours.

Please call me at (312) 886-6162, if you have any questions.

Sincerely,

Elizabeth H. Utley
Environmental Scientist

cc: Tom Carlisle, OEPA w/plan

bcc: Tom Golz
Part A File

5HW-TUB:LIZ UTLEY:PG:8-25-82

INITIALS / DATE	TYPIST	AUTHOR	PEU CHIEF	S... C...	...PS CHIEF	TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
	PG 8/25				KRS 8/26			

BEDFORD TIMES-REGISTER
459 Broadway
Bedford, O. 44146

MAPLE HEIGHTS PRESS
459 Broadway
Bedford, O. 44146

9/2/82

U.S. EPA Region V
RCRA Activities
PO Box A3587
Chicago IL 60690

In Account with office indicated below — Thank You.

Legal Notice: Closure Plan from Union Camp Corp.

Invoice No: 2775

Published 9/2/82

7" A $3.20 one week $22.40

OHD004166336

THE STATE OF OHIO } ss.
CUYAHOGA COUNTY }

Samuel J. Niver being duly sworn says that he is general manager for the publishers of the BEDFORD TIMES-REGISTER, a weekly newspaper published in said County of Cuyahoga and having a general circulation therein: and that the annexed advertisement was published in said newspaper on the following day or days.

9/2/82

S. J. Niver

Sworn to and subscribed before me this

2nd

day of Sept 19 82

Anna G. Niver

ANNA G. NIVER, Cuya. City
NOTARY PUBLIC
Notary Public, State of Ohio
My Commission Expires April 2, 1985

PUBLIC NOTICE

The U.S. Environmental Protection Agency (USEPA) has received a closure plan from Union Camp Corp. for a hazardous waste storage area in its plant located at 6225 Camp Industrial Road, Solon, Ohio. The plan, submitted on Aug. 2, 1982, proposed the removal of a maximum of 15 55-gallon drums of ink wastes for disposal in an approved off-site facility. According to the plan, the use of inks which result in hazardous wastes will be discontinued by Union Camp Corp. No hazardous wastes will remain on site after closure.

The Union Camp Corp. plan was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register Jan. 12, 1981. The plan will be evaluated by USEPA according to the criteria of the regulations.

The plan and related background materials are available to the public at USEPA Waste Management Division, 111 W. Jackson, Chicago, Illinois (312) 886-3713, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials also may be seen at the Solon Public Library, 33800 Inwood Road, Solon, Ohio, during business hours.

Public comments concerning this application are requested by USEPA and will be accepted through Oct. 4, 1982. Please send comments to:

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

BTR9/2/82;Inv.2775

Printers Fee $ 22.40

Affidavit

Total $ 22.40

Received Payment

PUBLIC NOTICE

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Public comments concerning this application are requested by USEPA and will be accepted through Oct. 4, 1982. Please send comments to:

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

CONTAINER DIVISION 6225 CAMP INDUSTRIAL RD., SOLON, OHIO 44139 TELEPHONE (216) 248-0125

February 14, 1986

RECEIVED
JUN 26 1986
OHD - AIS
U.S. EPA, REGION V

Mr. David A. Stringham
Chief, Solid Waste Branch
Environmental Protection Agency
RCRA Activities Region V
P.O. Box A-3587
Chicago, Illinois 60690

RE: EPA ID# OHD004166336 G PA

Dear Mr. Stringham:

Attached is the completed "Waste Minimization Addendum" for 1985 for the Union Camp Solon, Ohio facility as requested. In addition to completing the attached information sheet, we offer the following comments: Union Camp Corporation - Solon, Ohio has not generated, treated, stored or disposed of any hazardous waste since July 9, 1982. Browning Ferris Industries removed, transported, and disposed of 15 drums of waste at that time. Enclosed are copies of State of Michigan Manifest No. M10229702 showing disposal; our 1982 request for withdrawal of our Hazardous Waste Permit Application; our Closure Statement and Ohio and Region V EPA notification of our facility's removal from regulation under RCRA. This information should help clarify the situation.

We would appreciate your assistance and a formal reply from EPA Region V to this aforementioned status change, specifically addressing the paperwork requirements. Should you require additional information or clarification please advise.

Thank you for your consideration in this matter.

Sincerely,

F. A. Manfredonia
Manufacturing Manager

FAM:mpl

c: State of Ohio Environmental Protection Agency
Mr. Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management
361 E. Broad Street
Columbus, Ohio 43216-1049

WASTE MINIMIZATION ADDENDUM TO GENERATOR BIENNIAL OR ANNUAL HAZARDOUS WASTE REPORT FOR 1985

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1985.

The Hazardous and Solid Waste Amendments of 1984 require all generators of hazardous waste to submit the following information to the United States Environmental Protection Agency or a State authorized to collect such information:

GENERATOR's EPA I.D. No. |0|H|D|0|0|4|1|6|6|3|3|6|

GENERATOR NAME: Union Camp Corporation

GENERATOR ADDRESS: 6225 Camp Industrial Road

Solon, Ohio 44139

WASTE MINIMIZATION

Describe in the space below your efforts, undertaken during calendar year 1985, to reduce the volume and toxicity of the hazardous waste which your business generates. Also describe changes in waste volume and toxicity actually achieved during 1985 in comparison to previous years, to the extent possible.

This facility does not engage in hazardous waste activity. Please refer to attached letter.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

F. A. Manfredonia	Manufacturing Manager	F.A. Manfredonia	2-27-86
PRINT/TYPE NAME	TITLE	SIGNATURE	DATE SIGNED

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

MAY 14 1982

Mr. James Scazzaro
Union Camp Corporation
6225 Industrial Road
Solon, Ohio 44139

RE: Interim Status Acknowledgement USEPA ID No. OHD004166336
FACILITY NAME: Union Camp Corporation

Dear Mr. Scazzaro:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

5/19/82

Enclosure
cc: J.H. Neale

FACILITY NAME
UNION CAMP CORPORATION

EPA ID NUMBER
OHD004166336

FACILITY OPERATOR
UNION CAMP CORPORATION

FACILITY OWNER
UNION CAMP CORPORATION

FACILITY LOCATION
6225 CAMP INDUSTRIAL ROAD
SOLON OH 44139

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	100000.00000	G

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE	UNIT OF MEASURE	CODE
STORAGE:			GALLONS	G
			LITERS	L
CONTAINER	S01	G OR L	CUBIC YARDS	Y
TANK	S02	G OR L	CUBIC METERS	C
WASTE PILE	S03	Y OR C	GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G OR L	LITERS PER DAY	V
DISPOSAL:			TONS PER HOUR	D
			METRIC TONS\HOUR	W
INJECTION WELL	D79	G,L,U, OR V	GALLONS\HOUR	E
LANDFILL	D80	A OR P	LITERS\HOUR	H
LAND APPLICATION	D81	S OR Q	ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	ACRES	B
TREATMENT:			HECTARES	Q
			POUNDS\HOUR	J
TANK	T01	U OR V	KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	TONS PER DAY	N
INCINERATOR	T03	U,W,E, OR H	METRIC TONS\DAY	S
OTHER	T04	J,R,P,S,U,V		

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ OHD004166336 REACKNOWLEDGEMENT

UNION CAMP CORPORATION
6225 CAMP INDUSTRIAL ROAD
SOLON OH 44139

INSTALLATION ADDRESS ➤ 6225 CAMP INDUSTRIAL ROAD
SOLON OH 44139

EPA Form 8700-12B (4-80) 09/29/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO. — OHD004166336

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS — PLEASE PLACE LABEL IN THIS SPACE

III. LOCATION OF INSTALLATION

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F OHD004166336 T/A 2 C 1	A	80 08 18

I. NAME OF INSTALLATION

UNION CAMP CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3225 CAMP INDUSTRIAL ROAD

CITY OR TOWN: SOLON — ST.: OH — ZIP CODE: 44139

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5225 CAMP INDUSTRIAL ROAD

CITY OR TOWN: SOLON — ST.: OH — ZIP CODE: 44067

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 SCAZZARO JAMES GENERAL MANAGER

PHONE NO. *(area code & no.)*: 216-248-0125

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 UNION CAMP CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: OHD004166336

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 15 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	0	H	D	0	0	4	1	6	6	3	3	6	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- ☐ 1. IGNITABLE (D001)
- ☐ 2. CORROSIVE (D002)
- ☐ 3. REACTIVE (D003)
- ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
James J. Scazzaro	James J. Scazzaro General Manager	7/28/80

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

JUL 1 1986

Mr. F.A. Manfredonia
Manufacturing Manager
Union Camp Corporation
Container Division
6225 Camp Industrial Road
Solon, Ohio 44139

RE: Withdrawal of Part A (Non-Hazardous Waste)
FACILITY NAME: Union Camp Container Division
U.S. EPA ID NO.: OHD 004166336

Dear Mr. Manfredonia:

This is to acknowledge that we have completed our review of your Part A Hazardous Permit Application and your letter of February 14, 1986 requesting withdrawal of your Application. According to the information you have submitted, the wastes which are treated, stored or disposed at your facility are not defined as hazardous in 40 CFR 261.3. It is the opinion of this office, based on the information submitted, that your facility is not required to have a Hazardous Waste Permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must comply with all applicable State and local requirements.

You will retain your United States Environmental Protection Agency identification number, if you notified that the facility is a generator or transporter of hazardous waste.

Please contact the Authorization and Information Section at (312) 886-6148 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Non-Hazardous Waste)," in all correspondence on this matter.

Sincerely,

David A. Stringham, Chief
Solid Waste Branch

Please print or type in the unshaded areas only (fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S F 0HD 004166336 T/A C 3 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

CLOSED FACILITY – TSD ONLY

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill–in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill–in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold–faced terms.**

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)	16	X 17	18	B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)	19	X 20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	22	X 23	24	D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)	25	X 26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X 28	29	X 30	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	31	X 32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	34	X 35	36	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	37	X 38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	40	X 41	42	J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	43	X 44	45

III. NAME OF FACILITY

C 1 SKIP UNION CAMP CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
C 2 SCAZZARO JAMES GENERAL MANAGER	216 248 0125

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 6225 CAMP INDUSTRIAL ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 SOLON	OH	44139

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 6225 CAMP INDUSTRIAL ROAD

B. COUNTY NAME

CUYAHOGA

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 SOLON	OH	44139	035

EPA Form 3510-1 (6-80)

NOV 1 9 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2653 (specify) Paper Converting	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: UNION CAMP CORPORATION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): 201 628 9000

E. STREET OR P.O. BOX: 1600 VALLEY ROAD

F. CITY OR TOWN: WAYNE

G. STATE: NJ

H. ZIP CODE: 07470

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N	P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9 A/50

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturer of Corrugated Paperboard Packaging

F9 A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
J. H. Neale Vice President & General Manager	J. H. Neale	11/7/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only (fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER 336 [handwritten initials]

S		T/A	C
F	OHD004166336	3	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C	YR.	MO.	DAY
8	80	10	24

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A	C
C	DUP	3	1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	~~100,000~~ 000	G		7				
2					8				
3					9				
4					10				

EPA Form 3510-3 (6-80) NOV 13 1980 UNION CAMP CORPORATION, SOLON, OHIO

CONTINUE ON REVERSE

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

UNION CAMP CORPORATION, SOLON, OHIO

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	T/A	C	FOR OFFICIAL USE ONLY	T/A	C	
W OHD004166336	3	1	W DUP	3	2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*				D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
1	D008	750,000 000	P	S01				
2	D007							INCLUDED IN ABOVE
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F | 0 H D 0 0 4 1 6 6 3 3 6 | T/A 3 | C 6

P6A/SS

P6A/S6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 22 500 → 41 27 30 W	081 29 300 → N 41 28 50 W

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. H. Neale	J. H. Neale	11/7/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

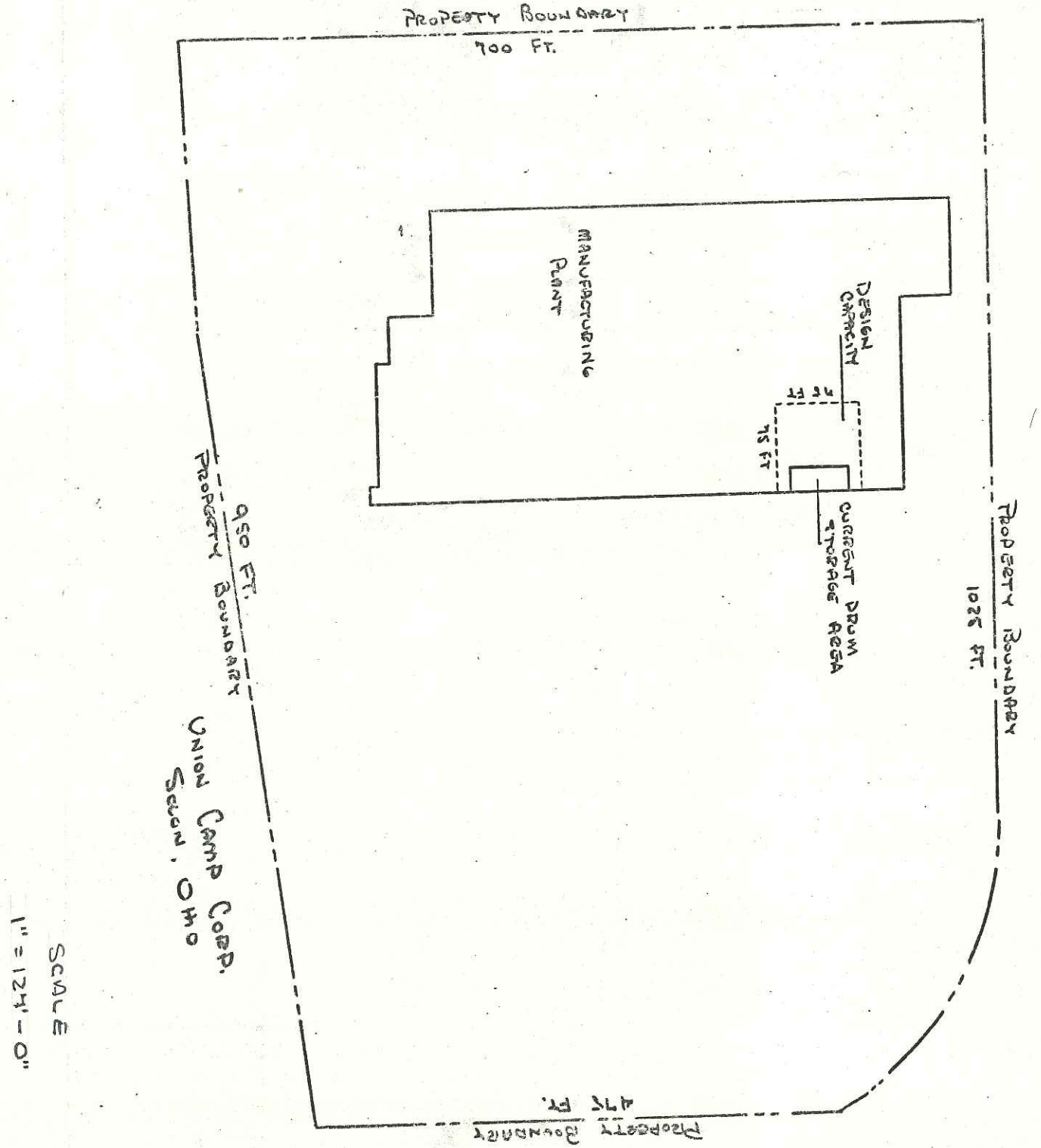
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. J. Scazzaro	James J. Scazzaro	10/27/80

UNION CAMP CORPORATION, SOLON, OHIO

Form Approved OMB No. 158-S80004

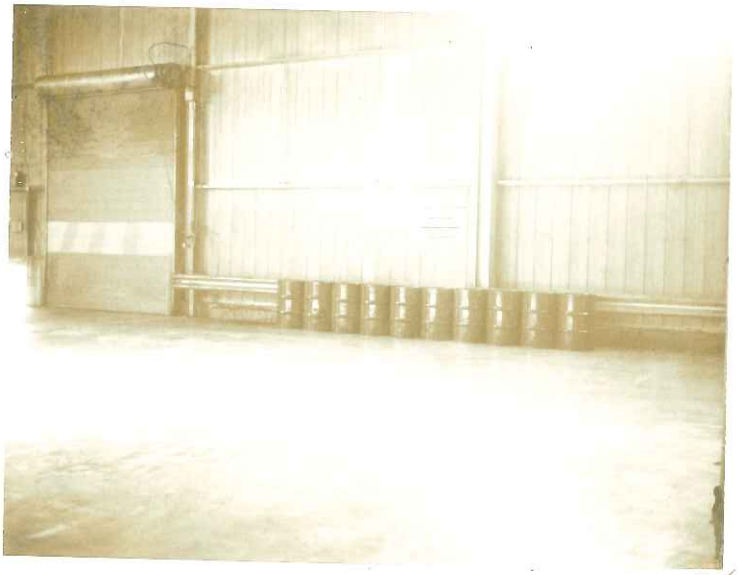
V. FACILITY DRAWING *(see page 4)*

524



524

UNION CAMP CORPORATION
SOLON, OHIO



A.4 Closure/Post-Closure

OhioEPA

Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD004166336
Ohio Permit No. 02-18-0480

April 3, 1985

major

F.A. Manfredonia
Manufacturing Manager
Union Camp Corporation
6225 Camp Industrial Rd.
Solon, Ohio 44139

Dear F.A. Manfredonia:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you have gone through formal closure and will no longer be a handler of hazardous waste.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.

1066R

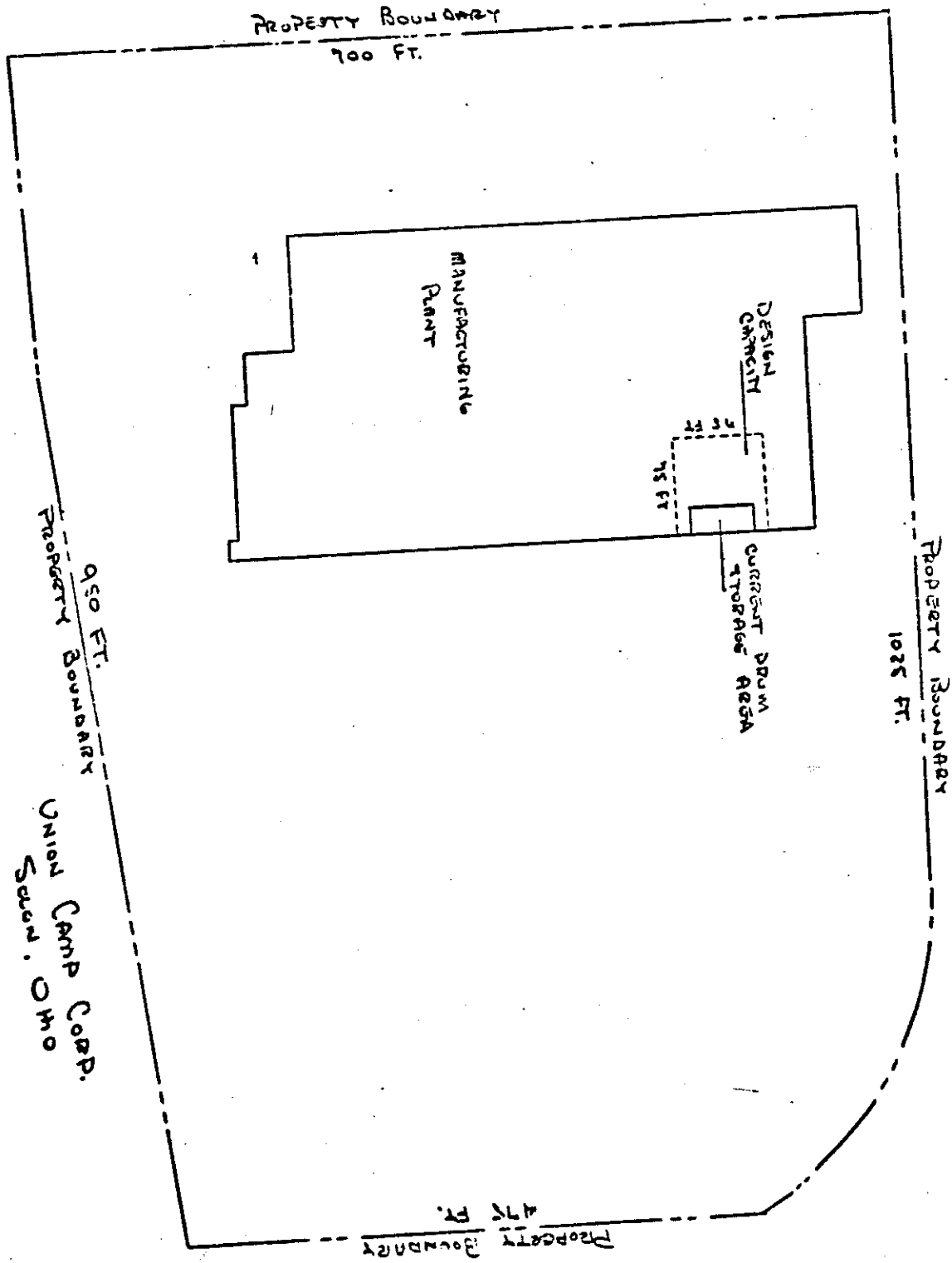

PROPERTY BOUNDARY
700 FT.
MANUFACTURING PLANT
DESIGN CAPACITY
CURRENT DRUM STORAGE AREA
PROPERTY BOUNDARY
1025 FT.
PROPERTY BOUNDARY
950 FT.
PROPERTY BOUNDARY
475 FT.
UNION CAMP CORP.
SAVON. OHIO
SCALE
1" = 124'-0"

TABLE A

SOLON, OH WASTEWATER ANALYSES

	Pb (mg/l)	Cr (mg/l)	% Solids	Specific Gravity	pH
RCRA Criteria Limits	5.0	5.0			
1170-ABC-Total Analysis	380	52.5	1.2	1.0011 g/ml	7.35
1170-ABC- EP Toxicity	0.7	n.d.			
1170-DEF-Total Analysis	0.6	0.7	0.17	0.9996 g/ml	8.5
1170-DEF- EP Toxicity	n.d.	n.d.			

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

NOV - 8 1982

REPLY TO ATTENTION OF:
5HW-TUB

NOV 0 2 1982

CONT. TECH.
NOV 1 2 1982

Mr. F.A. Manfredonia
Manufacturing Manager
Union Camp Corporation
Container Division
6225 Camp Industrial Road
Solon, Ohio 44139

RE: OHD004166336
Union Camp Container Division
Solon, Ohio

Dear Mr. Manfredonia:

Your closure plan for 15 drums of old waste removed to an off-site facility has been subjected to a 30-day period of public comments. No comments were received.

It is our understanding that since your process has changed, you no longer will store hazardous wastes. Since your closure was already complete when you notified us, and we have a copy of your manifest, we will accept a completed copy of manifest number MI 022 9702 (signed by the TSD) and your letter of July 29, 1982, as adequate certification of closure. Treatment, Storage or Disposal Facility

At this time, your division of Union Camp will be removed from our data base since your testing of your new process wastes have proved to be non-hazardous.

Please call Mrs. Elizabeth Utley of my staff at (312) 886-6162, if you have further questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Tom Carlisle, OEPA

5HW-TUB

NOV 02 1982

Mr. F.A. Manfredonia
Manufacturing Manager
Union Camp Corporation
Container Division
6225 Camp Industrial Road
Solon, Ohio 44139

RE: OHD004166336
Union Camp Container Division
Solon, Ohio

Dear Mr. Manfredonia:

Your closure plan for 15 drums of old waste removed to an off-site facility has been subjected to a 30-day period of public comments. No comments were received.

It is our understanding that since your process has changed, you no longer will store hazardous wastes. Since your closure was already complete when you notified us, and we have a copy of your manifest, we will accept a completed copy of manifest number MB 022 9702 (signed by the TSD) and your letter of July 29, 1982, as adequate certification of closure.

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Please call Mrs. Elizabeth Utley of my staff at (312) 886-6162, if you have further questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Tom Carlisle, OEPA

5HW-TUB:LIZ UTLEY:PG:10-12-82

	TYPIST				STU #2 CHIEF	TPS CHIEF		
INITIALS	PG				D Banaszak			
DATE	10/12/82	10-12-82			10-13-82	10/22	10/28/82	11/1

@mb 10/14/82 DS 10/25/82

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

UNION CAMP CORPORATION
SOLON, OHIO 44139
OHD 004 166 336

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 004 166 336
Date Prepared	:	December 17, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH56
Prepared by	:	PRC Environmental Management, Inc. Catherine Cooney
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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LIST OF TABLES

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LIST OF FIGURES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the Union Camp Corporation (Union Camp) facility in Solon, Ohio. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of Resource Conservation and Recovery Act (RCRA) facilities.

The Union Camp Corporation facility is located on a 15-acre site in Solon, Cuyahoga County, Ohio (longitude 81°27′30″W; latitude 41°23′50″N). The facility is situated in a primarily light industrial area with some residential neighborhoods within 1/2 mile. Many small ponds and lakes are within a 2-mile radius of the facility. Briar Hill Lake is located 1 mile to the northeast of the facility; the Chagrin State Scenic River is located 3-1/2 miles to the west of the facility. Union Camp is not located in a 100-year flood plain.

The Union Camp facility has been in operation since 1968. Union Camp produces corrugated paperboard and currently employs 106 people at the Solon facility. Production volume ranges from 30 to 40 thousand tons of finished product per year.

Union Camp converts paper into corrugated containers. Bulk paper is processed into corrugated paperboard sheets which are heated and laminated with a starch-based solution. A vinyl adhesive is used to bind a backing to the corrugated sheets. Packages of various sizes are then cut out of the sheets. Roll printers are used to imprint labels using flexographic inks. Union Camp also operates a maintenance shop for its equipment. The processes have remained basically unchanged since 1968.

In 1981, Union Camp obtained RCRA interim status to operate as a hazardous waste facility. Wastes generated by Union Camp include ink wash waters; spent solvents (mineral spirits); and waste oils. On April 15, 1982, Union Camp requested that U.S. EPA withdraw Union Camp's RCRA Part A permit application. Union Camp submitted a closure plan for its hazardous waste drum storage area along with a waste disposal manifest for fifteen 55-gallon drums of ink wash water to U.S. EPA on July 29, 1982. These were submitted simultaneously because Union

Camp had already implemented its closure plan. U.S. EPA approved certification of closure on November 2, 1982. Prior to 1982, the ink wash water generated at the facility was classified hazardous because of high levels of lead (D008) and chromium (D007). Starting in 1982, Union Camp changed its ink formula to one that contained lower levels of lead and chromium. The resulting wash water generated from the printing operations proved to be nonhazardous. Consequently, after closure in July 1982, all wash water was collected in floor sumps, pumped to a holding tank, and discharged to the sanitary sewer system. Other wastes Union Camp generates include waste oils used for maintenance and solvents (mineral spirits) used for cleaning parts. These wastes are stored in 55-gallon drums and sent offsite for reclamation.

The PA/VSI identified the following three SWMUs at the facility:

Solid Waste Management Units

1. Floor Sumps and Wash Water Holding Tank
2. Former Hazardous Waste Drum Storage Area
3. Nonhazardous Waste Drum Storage Area

No AOCs were identified at the facility.

No releases to ground water or surface water were observed during the PA/VSI nor have any documented releases been identified. The potential for release to these media is low because all SWMUs are located indoors. Nonhazardous wash water is discharged to the sanitary sewer system; all other wastes are stored in sealed drums on a concrete floor. The distance to the nearest surface water also limits the potential for a release to this media.

No releases to air were observed during the PA/VSI nor have any documented releases been identified. The potential for release to air is low because all SWMUs are located indoors. Nonhazardous wash water is discharged to the sanitary sewer system; all other wastes are stored in sealed drums on a concrete floor. The building limits the potential of a release to this media.

No releases to on-site soil were observed during the PA/VSI nor have any documented releases been identified. The potential for release to on-site soil is low because all SWMUs are located indoors. Nonhazardous wash water is discharged to the sanitary sewer system; all other wastes are stored in sealed drums on a concrete floor.

Access to the site is limited. The facility is bounded on the north by a warehouse, on the east by Camp Industrial Road, and on the south and west by railroad tracks. Possible receptors include residents of Solon, located less than 1/2-mile southeast of the facility. The threat of contamination via ground water, surface water, air or on-site soil from the facility is low; therefore, the risk for human exposure to contamination from the facility is low.

The potential for any release of hazardous wastes or hazardous constituents from this facility is low. As a result, PRC recommends no further action at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PAs) and visual site inspections (VSIs) of hazardous waste treatment and storage facilities in EPA Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential release(s) to the environment from solid waste management units (SWMUs) and areas of concern (AOCs).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Union Camp Corporation facility in Solon, Ohio. The PA was completed on April 16, 1991, when PRC gathered and reviewed information from Ohio EPA and from U.S. EPA Region 5 RCRA files. The VSI was conducted

on July 10, 1991. It included interviews with facility representatives and a walk-through inspection of the facility. Three SWMUs and no AOCs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C. Analytical results of the current wash water and UST removal are presented in Attachments D and E, respectively.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

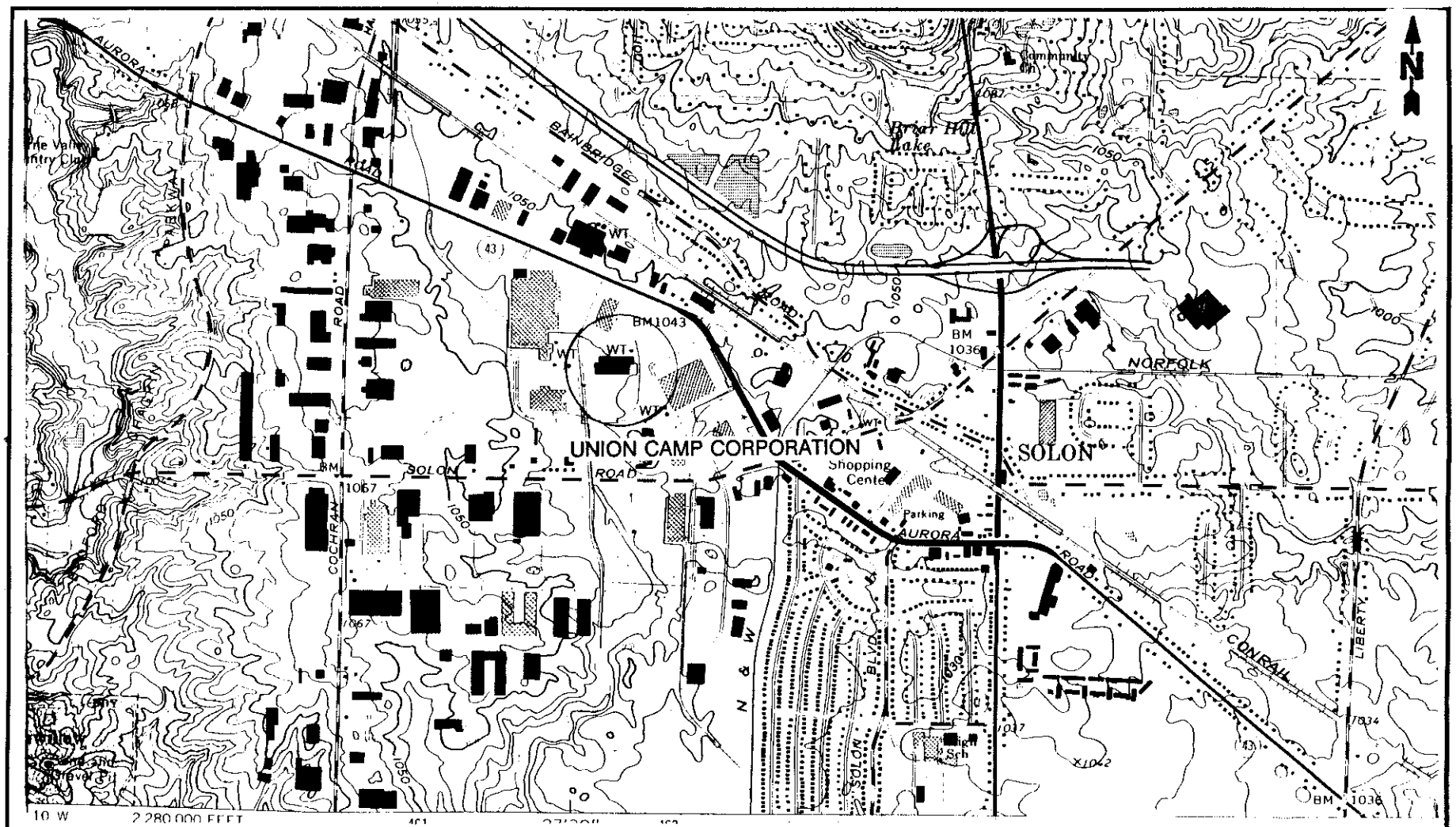
The Union Camp Corporation is located at 6255 Camp Industrial Road in Solon, Cuyahoga County, Ohio (longitude 81°27'30"W; latitude 41°23'50"N) (see Figure 1) (Union Camp, 1980b). The facility is approximately 10 miles southeast of the city of Cleveland and 20 miles southeast of Lake Erie. The Union Camp site occupies approximately 15 acres; buildings and other structures on the site occupy approximately 2.5 acres of the total acreage.

The facility is bordered on the north by a warehouse, on the east by Camp Industrial Road, and on the south and west by railroad tracks. The area surrounding Union Camp Corporation is primarily occupied by light industrial operations with some residential neighborhoods within 1/2 mile of the facility.

2.2 FACILITY OPERATIONS

The Union Camp facility has been in operation since 1968. Union Camp produces corrugated paperboard packaging and currently employs 106 people. Production volume ranges from 30,000 to 40,000 tons of finished product per year (Union Camp, 1991).

Union Camp converts paper into corrugated containers. Bulk paper is processed into corrugated paperboard sheets which are heated and laminated with starch. A solution of adhesive, cornstarch, borax, and an antibacterial agent is applied after the sheets are heated. A vinyl adhesive is used to bind a backing to the corrugated sheets. Packages of various sizes are then cut out of the sheets. Roll printers are used to imprint labels using flexographic inks. Union Camp also operates a maintenance shop for its equipment. The processes have remained basically unchanged since 1968 (Union Camp, 1991). Figure 2 shows the facility layout.



SCALE 1:24000

1 1/2 0 1 MILE

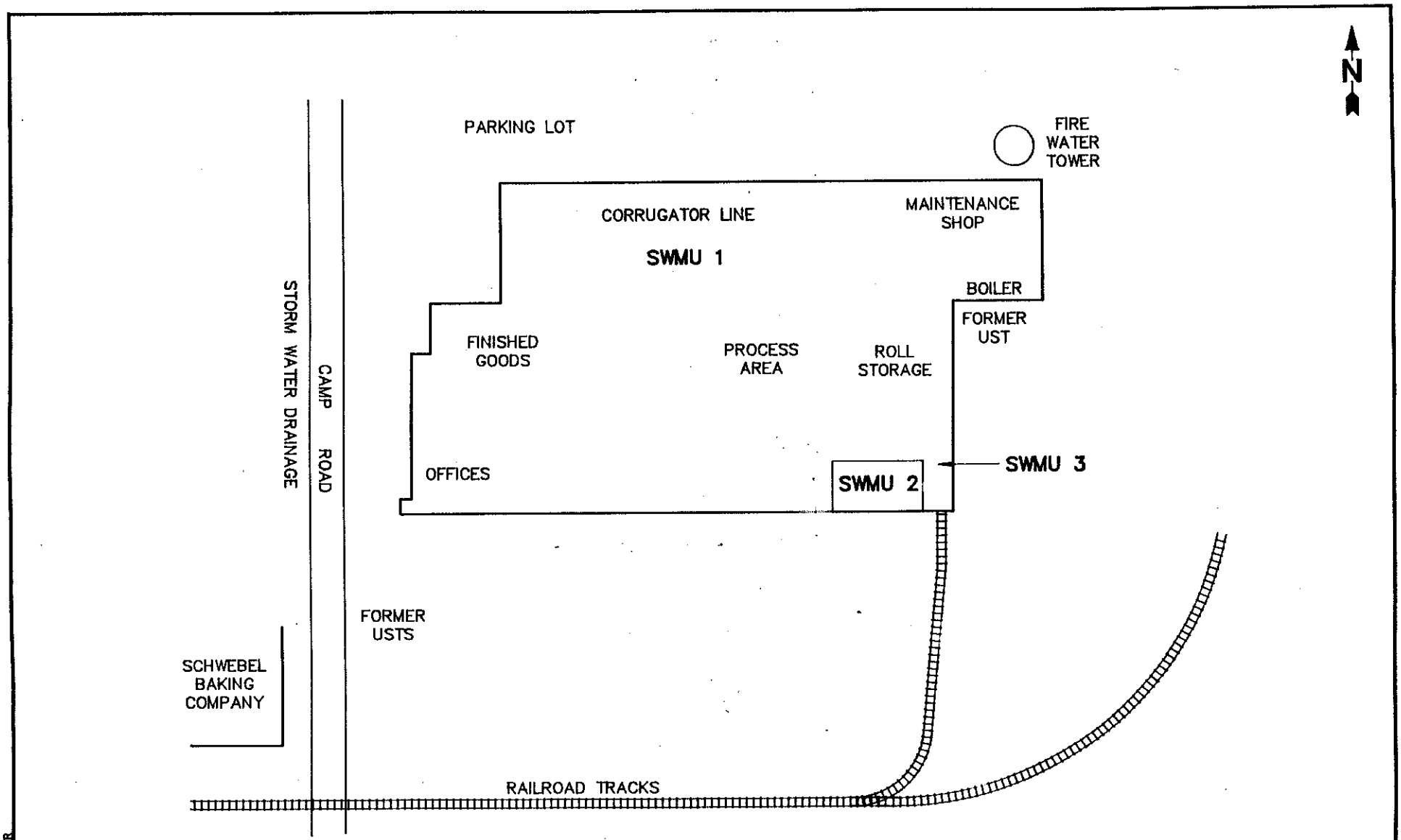
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SOURCE: USGS, 1984

UNION CAMP CORPORATION
CHAGRIN FALLS, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.



UNION CAMP CORPORATION
SOLON, OHIO

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

NOT TO SCALE

SOURCE: UNION CAMP FILES

UNIONLAY.DWG — 09/19/91 — CFR

The printing equipment is cleaned between applications; the wash water is collected in floor sumps (SWMUs 1 and 2) surrounding the equipment and discharged to the sanitary sewer system. Spent solvents used for cleaning and waste oils used for maintenance of the equipment are stored in 55-gallon drums (SWMU 3) for disposal or reclamation offsite. Table 1 lists the solid waste management units and their current status.

2.3 WASTE GENERATING PROCESSES

The primary waste generated by Union Camp is scrap paperboard. The paperboard is shredded, baled, and shipped to mills for recycling or sale. Other wastes generated at the facility include starch wash water and ink wash water from converting operations. Starch wash water is generated during lamination of corrugated sheets. Small amounts of starch sludge are generated; this sludge is washed into a drain leading to the municipal sanitary sewer system. Ink wash water is generated from washing the roll printers after their use. The ink wash water is collected in floor sumps (SWMU 1) next to each printer and pumped to a holding tank (SWMU 1). The ink wash water in the holding tank is discharged directly to the sanitary sewer system. Small quantities of waste oils and solvents are also generated during maintenance and cleaning operations. The waste oils and solvents are accumulated in 55-gallon drums and stored in a nonhazardous drum storage area (SWMU 3) in the southeast corner of the building. Waste oil and solvents are collected by Ullmen Oil and disposed of offsite approximately every 6 months. Table 2 lists the solid wastes generated at the facility, their source, and the units in which they are managed.

Until 1982, the wash water contained diluted flexographic inks containing elevated levels of chromium and lead pigments. These wastes were collected and stored on-site in 55-gallon drums. The drums were stored in the hazardous waste drum storage area (SWMU 2). During closure, a total of 15 55-gallon drums were removed and disposed of at an approved hazardous waste disposal facility on July 9, 1982. Subsequently, the facility switched to an ink containing lower concentrations of these metals. Analytical tests of the new ink wash water indicated that it was nonhazardous. Separate treatment of the ink wash water as hazardous waste was no longer necessary and the water could be discharged to the sanitary sewer system. Analytical results of two recent wash-water samples are provided in Attachment D.

Table 1

Solid Waste Management Units (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Floor Sumps and Wash Water Holding Tank	Yes	RCRA Closure Approved by U.S. EPA on November 2, 1982; Currently Active
2	Former Hazardous Waste Drum Storage Area	Yes	RCRA Closure Approved by U.S. EPA on November 2, 1982; Currently Inactive
3	Nonhazardous Waste Drum Storage Area	No	Active

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

Table 2

Solid Wastes

Waste/EPA Waste Code	Source	Primary Management Unit
Nonhazardous Wash Water	Printing Process	1
Washwaters Containing Chromium (D007) and Lead (D008)	Printing Process	1 and 2
Waste Oils	Maintenance	3
Spent Solvents	Cleaning	3

2.4 RELEASE HISTORY

There are no documented releases of hazardous waste or hazardous constituents from this facility into ground water, surface water, air, or soil. During the PA/VSI, some stains were found on the floor in the present drum storage area (SWMU 3). These stains are around the waste oil drums and on the sides of the waste oil drums (PRC, 1991).

2.5 REGULATORY HISTORY

Union Camp submitted a Notification of Hazardous Waste Activity to U.S. EPA in October 1980 (Union Camp, 1980a). The notification identified Union Camp as a generator of hazardous wastes containing lead (D008) and chromium (D007). The facility subsequently submitted a RCRA Part A permit application in November 1980 to the U.S. EPA to treat and store hazardous waste on-site in a drum storage area (SWMU 2) (Union Camp, 1980b). The facility was issued a permit (No. 02-18-0480) from the Ohio State Hazardous Waste Facility Approval Board on August 26, 1981 (Ohio EPA, 1981b).

The facility submitted a request for withdrawal of its RCRA Part A hazardous waste permit application on April 15, 1982 (Union Camp, 1982a). Union Camp submitted a closure plan along with a waste disposal manifest (No. MI0229702) on July 29, 1982 for 15 55-gallon drums of ink wash water (Union Camp, 1982b). The U.S. EPA approved Union Camp's certification of closure on November 2, 1982 (U.S. EPA, 1982). The facility now operates as a small quantity generator and stores only waste oil and solvents in the nonhazardous drum storage area (SWMU 3).

The facility had three underground storage tanks (USTs) which were removed in 1989. The tanks held gasoline and diesel fuel. The tanks were tested for system tightness, excavated, and removed from the property. After the USTs were removed, soil samples were taken to verify that the surrounding areas were clean. On December 13, 1989, the Ohio Department of Commerce verified the closure assessment report for the UST removal (White, 1989). Approximate locations of the USTs are shown in Figure 2. Analytical results from the soil samples can be found in Attachment E.

Union Camp has been cited in the past for violating applicable hazardous waste regulations. Specifically, Union Camp has been cited for violations concerning waste analysis (40

CFR Section 265.13) and contingency plan requirements (40 CFR Section 265.52) (Ohio EPA, 1981a).

The Union Camp facility is not subject to the notification requirements under Section 103 (c) of CERCLA. No information was obtained on any other CERCLA requirements or actions regarding this facility.

Union Camp has not applied for Clean Water Act National Pollutant Discharge Elimination System (NPDES) permits.

No information was obtained on any air permits held by the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the regional area of the Union Camp facility.

2.6.1 Climate

Average temperatures in Cleveland, which is 10 miles northwest of Solon, range from a low of 26 degrees Fahrenheit (°F) in January to a high of 72 °F in July. Northern areas nearest Lake Erie are markedly colder than the rest of the area in summer. Precipitation is well distributed during the year. From late fall through winter, snow squalls are frequent and total snowfall is normally heavy. Of the total annual precipitation, 60 percent usually falls in April through September. Average annual precipitation is 35.4 inches. Average annual net precipitation is 4.5 inches and the intensity of a 1-year 24-hour rainfall is 2 inches. Average relative humidity in mid-afternoon is about 60 percent. Humidity is greater at night, and the average at dawn is about 80 percent. The percentage of possible sunshine is 70 percent in summer and 30 percent in winter. The prevailing wind direction is from the south. Average wind speed is highest, 13 miles per hour, in January (National Oceanic and Atmospheric Administration, 1990).

2.6.2 Flood Plain and Surface Water

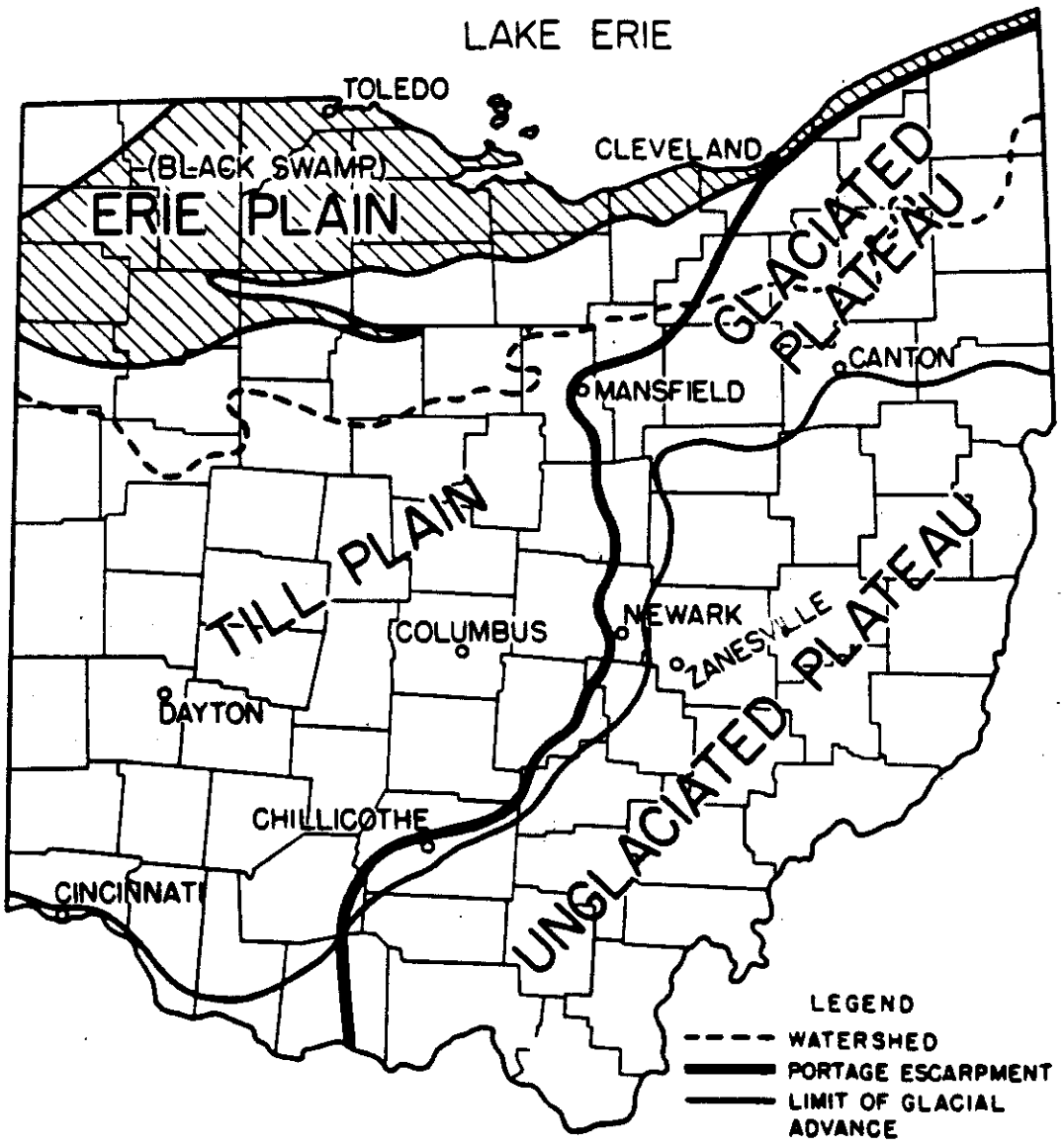
The Union Camp facility is located less than 1 mile southwest of Briar Hill Lake, and approximately 3-1/2 miles from Chagrin State Scenic River. The area is also dotted with smaller ponds and lakes varying in sizes, all within a 2-mile radius of the facility. The facility is not located in a 100-year flood plain (U.S. Geological Survey [USGS], 1974).

2.6.3 Geology and Soils

The exposed rocks of the area are of sedimentary origin and range in age from late Devonian to Pleistocene. They fall into two general classes: indurated stratified rocks of late Devonian and early Carboniferous age, and unconsolidated surficial deposits of Pleistocene age. The surficial deposits consist mainly of Pleistocene glacial and lacustrine deposits of recent alluvium. These Pleistocene deposits form a blanket ranging in thickness from 0 to 440 feet. The indurated rocks everywhere underlie the Pleistocene deposits and crop out in the beds and gorges of streams, quarries, and other excavations. The total thickness of Paleozoic strata exposed in this area is about 750 feet. These beds consist of shale, sandstone, and conglomerate of late Devonian, early Mississippian, and early Pennsylvanian age (Cushing et al., 1931).

As seen in Figures 3 and 4, the rock sections at Cleveland, separated by varying thicknesses of weak shale, mark the surface of the Appalachian Plateau and the two lesser platforms on the slope of the Portage escarpment. The uppermost of the rocks in this formation is the Sharon conglomerate, of lower Pennsylvanian age. It is the youngest exposed Paleozoic rock in this area, and is the capstone formation of the plateau across northeastern Ohio. Below the Sharon conglomerate, other formations include: the Orangeville and Meadville shales of Mississippian age; the Cleveland and Bedford shales, classed by some as Upper Devonian and by others as lower Mississippian age, and the Chagrin shale of the upper Devonian age. Figure 5 shows these rocks as they appear in the area below the Cleveland area (Cushing et al., 1931).

Exposed rocks are underlain by large thicknesses of Devonian, Silurian, and Ordovician formations, and presumably of Cambrian also, resting on a floor of Pre-Cambrian crystalline rocks. The soils of the area around the facility are made up mostly of Mahoning soil and Urban land. This combination of soils is generally found in broad areas, on till plains in the higher parts of the lake plains. The soil near the facility is composed of approximately 55 percent Mahoning



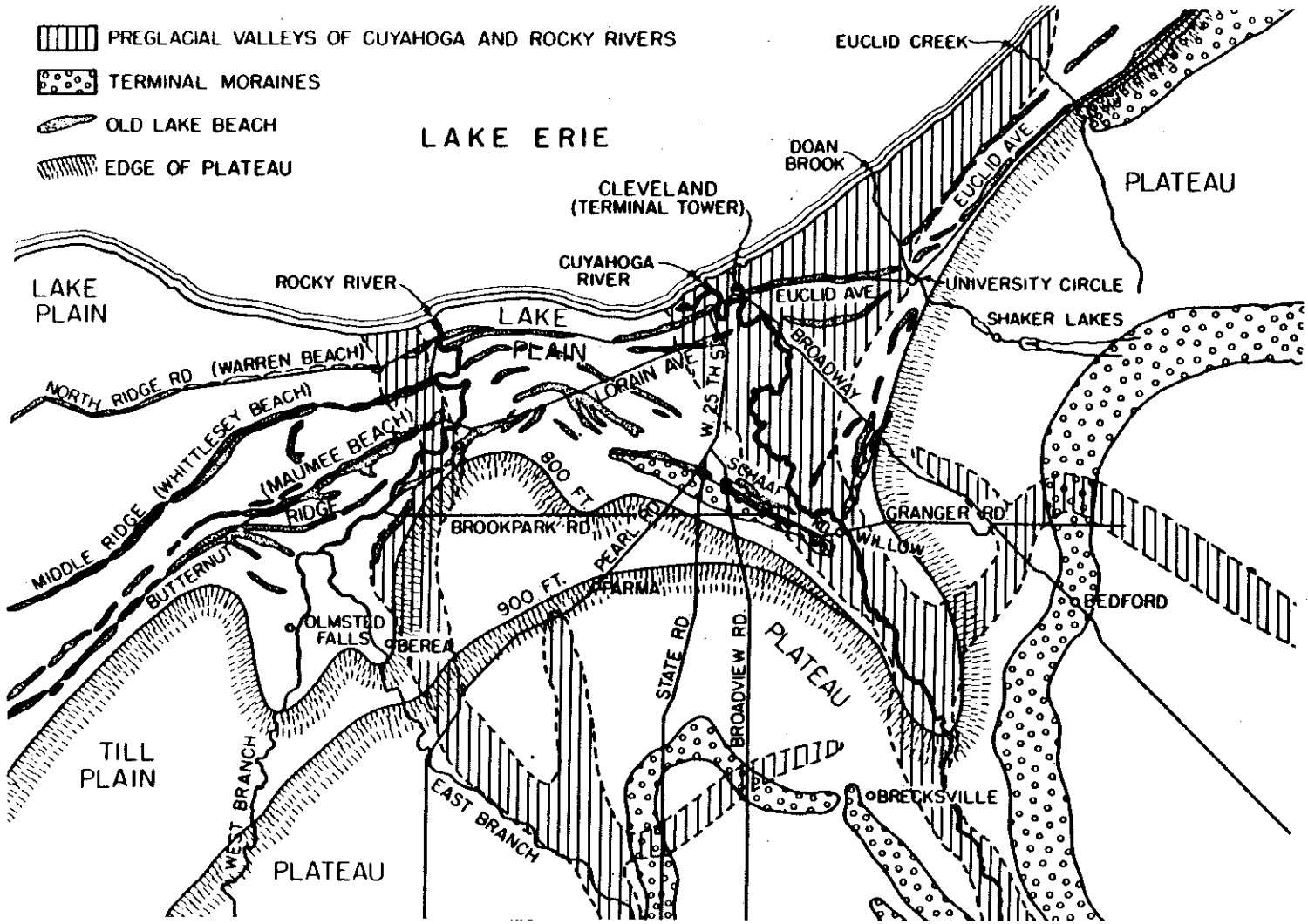
SCALE NOT AVAILABLE

SOURCE: WILLIAMS, 1940

UNION CAMP CORPORATION
SOLON, OHIO

FIGURE 3
PHYSIOGRAPHIC BOUNDARY LINES IN OHIO

PRC ENVIRONMENTAL MANAGEMENT, INC.



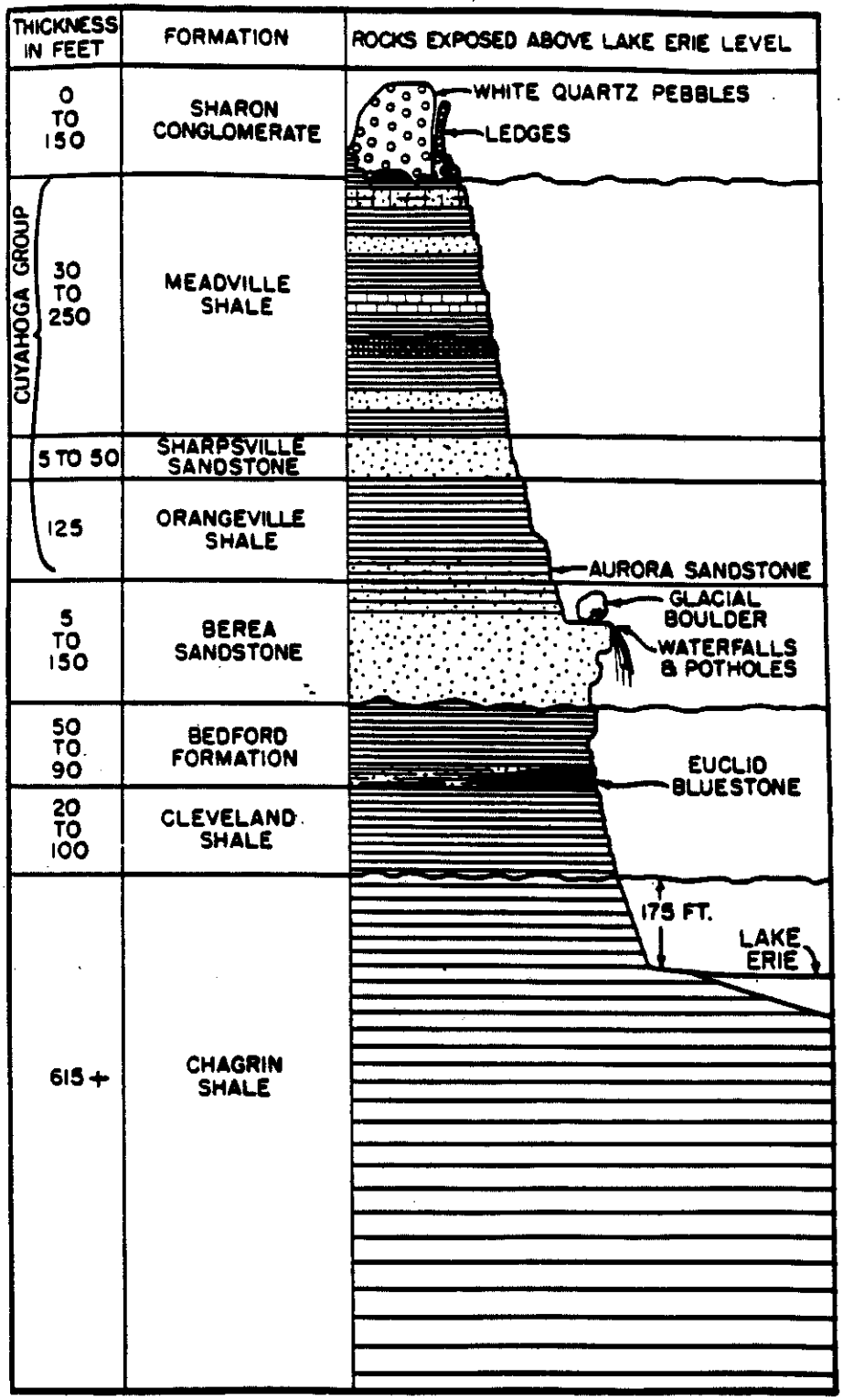
SCALE NOT AVAILABLE

SOURCE: WILLIAMS, 1940

UNION CAMP CORPORATION
SOLON, OHIO

FIGURE 4
GEOLOGICAL FEATURES OF THE CLEVELAND AREA

ENVIRONMENTAL MANAGEMENT, INC.



SOURCE: WILLIAMS, 1940

UNION CAMP CORPORATION
SOLON, OHIO

FIGURE 5
REPRESENTATIVE GEOLOGIC CROSS-SECTION
OF THE CLEVELAND AREA

ENVIRONMENTAL MANAGEMENT, INC.

silt loam and 30 percent Urban land. The areas of Mahoning soil are so intricately mixed with other soils it is extremely difficult to map them separately. The soil association in this area is known as the Mahoning-Urban land complex. These are nearly level to very gently sloping areas, with somewhat poorly drained soils. Typically, the Mahoning soil has a surface layer of dark grayish brown, friable silt loam about 7 inches thick. The subsoil is about 32 inches thick, made up of yellowish brown to olive brown silty clay loam that is mottled and firm. Mahoning-Urban land soil complex is mostly used as fill material in parks, open space, building sites, lawns and gardens. However, it is generally unsuited as a site for most sanitary facilities because of its poor drainage qualities.

2.6.4 Ground Water

Most of the population of the Solon area obtains its water supply from the Cleveland Municipal Water Supply, which draws from Lake Erie. However, there are many alterations of sand and gravel within the clay in the glacial drift that are capable of storing large amounts of water. The contact of the glacial drift with the underlying Bedford, Orangeville, and Meadville shales is also a source of water, especially where the drift is thick and consists largely of sand and gravel. There are also water-bearing sandstone strata within the Cleveland, Chagrin, and underlying shales of Portage age (Cushing et al., 1931); however, the immediate area around the facility is underlain largely by sand and gravel, where water occurs in thin and narrow, often discontinuous coarse sand and gravel lenses. Wells commonly yield a ground-water flow rate of 5 to 10 gallons per minute. However, some wells may penetrate the entire thickness of valley fill and encounter no satisfactory aquifers.

2.7 RECEPTORS

The facility is located approximately 1 mile northwest of downtown Solon, Ohio. The population of Solon is approximately 13,340. The nearest homes are located 1/2-mile south of the facility on Solon Road. The immediate area is primarily occupied by light industries. The Schwebel Baking Company is just west of Union Camp on the west side of Camp Industrial Road. Venture Lighting International is to the east of the facility on Aurora Road.

The facility is not surrounded by a fence. A Honeywell Security System prevents unauthorized access to the facility during off hours.

The city of Solon is supplied with drinking water by the Cleveland Municipal Water Supply. Approximately 3,800 residences are supplied by this source (Hromco, 1991). The intake for the water supply draws from Lake Erie, 20 miles to the northwest. Many small lakes and ponds, all within a 1/2- to 2-mile radius of the facility. The two largest water bodies are Briar Hill Lake, less than 1 mile from the facility, and Chagrin State Scenic River, 3-1/2 miles from the site. No sensitive environments such as public parks, critical wildlife habitats, or wetlands are located within a 2-mile radius of the facility (USGS, 1984a).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1 **Floor Sumps and Wash Water Holding Tank**

Unit Description: The floor sumps are located next to each piece of printing machinery. The sumps collect wash water used to clean the equipment. The wash water collects in the sumps and is pumped to a holding tank. The wash water is then discharged to the sanitary sewer system at a rate of approximately 300 to 400 gallons per day (McDarby, 1991). Until 1982, the wash water collected in the sumps was classified as hazardous because it contained high amounts of lead (D008) and chromium (D007). This hazardous wash water was contained in 55-gallon drums and stored in the former hazardous waste drum storage area (SWMU 2). Starting in 1982, the ink contained sufficiently low levels of lead and chromium to be classified as nonhazardous. After the unit (SWMU 1) underwent closure in July 1982, all wash water was pumped to the holding tank and subsequently discharged to the sanitary sewer system. Photograph 1 in Attachment B shows a sump surrounding a roller machine.

Date of Startup: 1968

Date of Closure: The unit underwent RCRA closure on July 29, 1982. The U.S. EPA approved closure certification on November 2, 1982. The unit is currently operating.

Wastes Managed: Flexographic ink wash water containing chromium (D007) and lead (D008) pigments until July 1982. Starting in July 1982, the waste was nonhazardous wash water.

Release Controls: The sumps are made of concrete and wash water in the sumps is pumped to a holding tank. The holding tank then discharges the wash water to the sanitary sewer system.

History of Release: There have been no documented releases of hazardous wastes or hazardous constituents from this unit.

Observations: The unit appeared in good condition (PRC, 1991).

SWMU 2 **Former Hazardous Waste Drum Storage Area**

Unit Description: This unit consisted of 55-gallon drums stored indoors on a concrete floor near the southeast corner of the building. The unit measured approximately 20 feet by 20 feet. The unit had a capacity of 15 55-gallon drums. In 1982, the unit went through closure and is now inactive. The

contents of the drums were tested for EP toxicity for lead and chromium. They were also tested for total lead and chromium, percent solids, specific gravity, and pH. Photograph 2 in Attachment B shows the unit.

Date of Startup: 1968

Date of Closure: The unit underwent RCRA closure on July 29, 1982. The U.S. EPA approved closure certification on November 2, 1982.

Wastes Managed: Hazardous flexographic ink wash water containing (D007, D008) chromium and lead pigments.

Release Controls: The drums were stored on a concrete floor in the corner of the building. Sheet metal walls to the south and east acted as secondary containment.

History of Release: There have been no documented releases of hazardous wastes or hazardous constituents from this unit.

Observations: The area stores large rolls of paper (PRC, 1991).

SWMU 3 **Nonhazardous Waste Drum Storage Area**

Unit Description: This unit is located in the southeast corner of the facility. The unit has a concrete floor and is bounded on the south and east by a sheet-metal wall. The unit measures approximately 20 feet by 20 feet. The total storage capacity of the unit is 15 drums. Drums containing waste oils and solvents (mineral spirits) are stored on wooden pallets. Waste oils and solvents are taken offsite and recycled or disposed of by Ullmen Oil approximately every 6 months. Photograph 3 in Attachment B shows this area.

Date of Startup: 1968

Date of Closure: The unit is still in operation.

Wastes Managed: The unit stores waste solvents (mineral spirits) and waste oils.

Release Controls: The unit is on a concrete floor with a 12-inch berm serving as containment. Sheet-metal walls to the south and east act as secondary containment.

History of Release: There have been no documented releases of hazardous wastes or hazardous constituents from this unit.

Observations: The floor appeared to be in good condition (no cracks), although there are some stains on the floor in the area around the drums. Drums were on wooden pallets on the concrete floor during the VSI (PRC, 1991).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified three SWMUs at the Union Camp facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the Union Camp facility and suggested further actions.

SWMU 1 **Floor Sumps and Wash Water Holding Tank**

Conclusions: This unit consists of floor sumps surrounding every printing machine. The sumps collect wash water used to clean the equipment. The water in the sumps is pumped to a holding tank and then discharged to the sanitary sewer system. Management of hazardous wastes in this unit ceased in 1981. RCRA closure was approved by U.S. EPA on November 2, 1982. The unit currently manages nonhazardous wastes. The unit poses a low threat of current or future releases. The probability of a release to environmental media is summarized below.

Ground Water: Low; the unit is indoors and discharges to the sanitary sewer system.

Surface Water: Low; the unit is indoors and discharges to the sanitary sewer system.

Air: Low; this unit is indoors, the building acts as secondary containment.

On-site Soil: Low; the unit is indoors and discharges to the sanitary sewer system.

Recommendations: PRC recommends no further action at this time.

SWMU 2 **Former Hazardous Waste Drum Storage Area**

Conclusions: This unit formerly stored hazardous wash water in 55-gallon drums on a concrete pad. Hazardous waste storage in this unit ceased in July 1982. RCRA closure was approved by U.S. EPA on November 2, 1982. The unit poses a low threat of current or future releases. The probability of a release to environmental media is summarized below.

Ground Water: Low; the unit is indoors and no longer handles wastes.

Surface Water: Low; the unit is indoors and no longer handles wastes.

Table 3

SWMU Summary

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
Floor Sumps and Wash Water Holding Tank	1968 - present	None	No further action
Former Hazardous Waste Drum Storage Area	1968 - 1982	None	No further action
Nonhazardous Waste Drum Storage Area	1968 - present	None	No further action

Air: Low; the unit is indoors and no longer handles wastes.

On-site Soil: Low; the unit is indoors and no longer handles wastes.

Recommendations: PRC recommends no further action at this time.

SWMU 3 **Nonhazardous Waste Drum Storage Area**

Conclusions: This unit stores spent solvents and waste oils in 55-gallon drums on a concrete floor. The unit poses a low threat of current or future releases. The probability of a release to environmental media is summarized below.

Ground Water: Low; the unit is indoors on a concrete floor. The floor and surrounding walls act as secondary containment.

Surface Water: Low; the unit is indoors on a concrete floor. The floor and surrounding walls act as secondary containment. The distance to the nearest surface water also limits the potential of a release to this media.

Air: Low; the unit is indoors on a concrete floor. The building limits the potential of a release to this media.

On-site Soil: Low; the unit is indoors on a concrete floor. The floor and surrounding walls act as secondary containment.

Recommendations: PRC recommends no further action at this time.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

POTENTIAL HAZARDOUS WASTE SITE

EPA

PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD004166336

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Union Camp Corporation	6225 Camp Industrial Road				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Solon	OH	44139	Cuyahoga	035	19
09 COORDINATES: LATITUDE	**LONGITUDE**				
17°23'40"N	81°27'30"W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
Route 77 south to Route 480. Route 480 east to Aurora Road. Aurora east to Camp Industrial Road. Left on Camp Industrial Road. Facility is on the left.

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*		
Union Camp Corporation	600 Valley Road		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Wayne	NJ	07470	201-628-9000
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Union Camp Corporation	6225 Camp Industrial Road		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Solon	OH	44139	216-248-0125

13 TYPE OF OWNERSHIP *(Check one)*
☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
☒ A. RCRA 3010 DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES DATE 07/10/91
☐ NO

BY *(Check all that apply)*
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*
☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
1968 (BEGINNING YEAR) Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Wastes include waste oils, mineral spirits, nonhazardous wastewater and paperboard.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The facility poses a low threat to human health and the environment.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Catherine Coony		PRC-EMI	(215) 972-0470	09/ 26 /91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD004166336

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*
- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ D. OTHER_____ *(Specify)*
- ☐ E. SLURRY
- ☒ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON_____

CUBIC YARDS_____

NO. OF DRUMS 5 per year

03 WASTE CHARACTERISTICS *(Check all that apply)*
- ☐ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. INFLAMMABLE
- ☒ H. IGNITABLE
- ☒ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE	4	55-gallon drums	
SOL	SOLVENTS	1	55-gallon drums	
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SOL	PETROLEUM SPIRITS	8030-30-6	55-gallon drums		
OLW	WASTE OILS		55-gallon drums		

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Preliminary Review of U.S. and Ohio EPA files.
Visual Site Inspection July 10, 1991.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	OHD004166336

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

The nearest surface water is Briar Hill Lake located 1 mile from the facility.

01 ☒ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0-100 — 04 NARRATIVE DESCRIPTION

Wastes generated include volatile mineral spirits. The building limits the potential of a release to this media.

01 ☒ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0-100 — 04 NARRATIVE DESCRIPTION

The facility manages ignitable mineral spirits.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Access to the site is limited.

01 ☐ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) — 04 NARRATIVE DESCRIPTION

All USTs have been removed.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

City of Solon is supplied with drinking water by Cleveland Municipal Water Supply.

01 ☒ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0-100 — 04 NARRATIVE DESCRIPTION

Workers could be exposed to fumes and fire hazard posed by mineral spirits.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

None.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	OHD004166336

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

01 ☐ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

01 ☐ O. CONTAMINATION OF SEWERS, DRAINS, WWTPS 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: 0-100 site workers

IV. COMMENTS

Site appears to present a minimal threat to human health and the environment.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Preliminary review of U.S. and Ohio EPA files.
Visual Site Inspection (July 10, 1991).

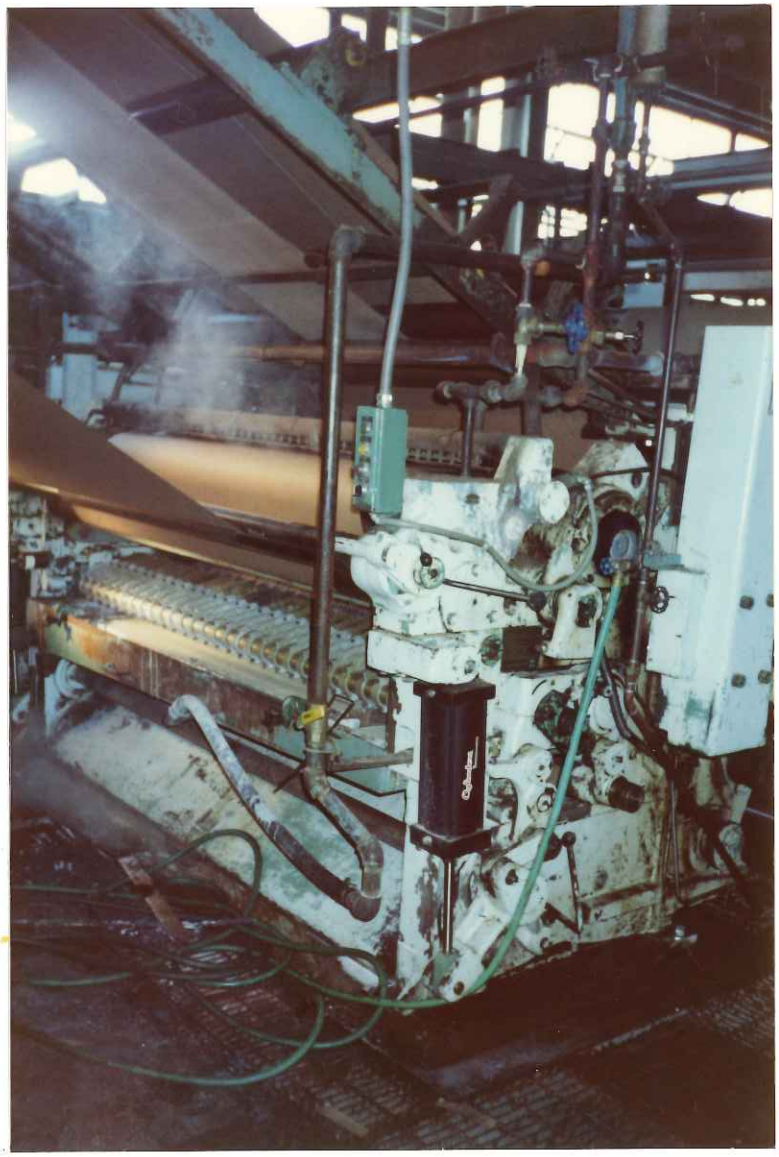
ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Union Camp Corporation
Solon, Ohio 44139
OHD 004 166 336

Date:	July 10, 1991
Facility Representatives:	Guy Hunt III, Union Camp Corporation, Environmental Specialist, (404) 621-2215 David Burns, Union Camp Corporation, Quality Systems Manager, (216) 248-0125 James Thornton, Union Camp Corporation, Specialist - Water Resources (912) 238-7483 Dennis McDarby, Union Camp Corporation, Plant Manufacturing Manager, (216) 248-0125
Inspection Team:	Paul Wooldridge, PRC Environmental Management, Inc., (703) 883-8846 Catherine Cooney, PRC Environmental Management, Inc., (215) 972-0470
Photographer:	Catherine Cooney
Weather Conditions:	Warm, 70-80°F
Summary of Activities:	The visual site inspection began at 10:10 a.m. at the Union Camp facility in Solon, Ohio. Paul Wooldridge reviewed the purpose of the VSI and the overall U.S. EPA Region 5 Environmental Priorities Initiative program with the Union Camp representatives. Union Camp representatives then gave an overview of the history of the facility and the operations taking place at the plant. Waste generation, storage, and disposal were discussed at length. Photographs taken during the VSI are presented in the following pages. A tour of the facility began at 11:10 a.m. The PRC team inspected all SWMUs at the facility. At approximately 11:40 a.m., the PRC and Union Camp representatives returned to the conference room for debriefing. After a brief exit interview, the PRC team left the facility at 11:45 a.m.



Photograph No. 1 **Location:** SWMU 1
Orientation: North **Date:** July 10, 1991
Description: Photograph shows floor sumps surrounding a roller machine.

Photograph No. 2 **Location:** SWMU 2
Orientation: Southwest **Date:** July 10, 1991
Description: Photograph shows the former hazardous waste drum storage area. Paper rolls were stored in the area at the time of the VSI.

Photograph No. 3 **Location:** SWMU 3
Orientation: Northwest **Date:** July 10, 1991
Description: Photograph shows nonhazardous waste drum storage area.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

3-21-91 PW

Room at west side of bld.

- Was used for production ~~of~~ PW in paint processes
- cleaned out, except for steel beams that held equipment.

Racoon creek borders drive on W side of building

~ 10-15' wide, shallow

This = closest surface water to site.

1220 Finish inspection, wrap-up.

1225 PW, DH offsite.

7-10-91 CMH 10:10 AM

Guy Hunt - Environmental

Ed

Dennis McDarby

Dave Evans

James Morton

Union camp still in NJ?

yes.

PRC: Paul Woolridge

Cathy Hardy

Paul - intro - explained we are eyes & ears of EPA. Explained EPI

- No areas that should not be photographed.

Process same as 1981

42

5-21-91 PW

Room at West side of bld.
- Was used for production
PW
of in paint processes
- cleaned out, except for steel beams that held equipment.

Racoon creek borders drive on W side of building
~ 10 - 15' wide, shallow
This = closest surface water to site.

1220 Finish inspection, wrap-up.

1225 PW, DH offsite.

7-10-91 CMH 10:10 AM

43

Guy Hunt - Environmental Tel
Dennis McDaeby
Dave Burns
James Thorton
Union camp still in NJ?
yes.
PRC: Paul Woodridge
Cathy Hardy

Paul - intro - explained we are eyes & ears of EPA. Explained EPI

- No areas that should not be photographed

Process same use 1981

Paul asked about more analytical data.

Dave went out to get us data from water sampling done by State

Paul asked if boilers were for power for facility. Yes.

Size of property? Ted will get a copy of map that shows exact property.

Are there any underground storage tanks? yes there were three - they were removed. - they were

what did tanks contain?

Ted: fuel, diesel, gas. taken out about 2 yrs ago. there were soil samples taken.

Ted: no leakage. they were pressure tested before taken out. They will get copy of file for us.

Any minor spills?

no spills of > 55 gallon drum. Ted: nothing major

Where does waste oil come from: mass + production. Brulin manufacturing makes solvents. w/ parts wash station then dumped w/ waste oil + taken away.

Waste solvents stored 50 ft. away in buckets. Is it considered satellite accum. area. ~~[illegible]~~ labeled can w/ WO (waste oil) and

Who takes waste away? Willmen Oil.

Processes that generate waste:
Waste paper: shredded, baled + taken away for recycling
Starch sludge: adhesive, cornstarch, borax, preservative, antibacterial agent. Some does go down drain. The sludge is a gel.

- Process study: paper from mills, make corrugated sheets. Machine heated 350-360° for moisture removal. Liner laminated w/ starch. Goes to heat hot plating, then starch reaches 140° then gels together. Starch washwater goes in drains on floor to sanitary sewer.
- Dri converting area is where ink is used.
Printing presses - flexographic (same as newspapers). Use adhesive. Print it, slot it, score it +

What kind of printing press? roll printing

7-10-91 CMH

Ink Sludge from what is left on machine & from water that washes rollers & flushes system. This is into wash water.

Are there any other processes at facility that discharge into Sewer. No

Vinyl adhesive is like elmers glue. minute waste.

Any other chemicals No - Only detergents.

any coolants on boilers - no.

7-10-91 CMH

access roads - 2. There is rail. Access roads used to ship finished products. They have their own spur coming off rail (to receive materials)

Previous land use -
Ted: 1967 - this facility was built
1968 - opened
Union Camp built this facility. Operations began in 1968. Process has stayed same since.

Drum Storage Area they still store drums. It is on concrete floor.

Ted: There is a drum rack.
The drum storage racks have been there for 20 yrs. They only store oils & solvents.
There is no floor drain in the area. Maybe one 40 ft away.
Sheet metal walls
Bermed 12 inches wide

Paul brought up inspections from 1981-82 no one ~~recalled~~ CMH recollected any.

Paul showed everyone map
Ted confirmed map as being basically same as one they would send up.

are there any floor pits near drum area. Ted About 50 ft feet away for water softeners (for boilers).

Paul: ink went into floor pits then dumped. ~~Then~~ CMH (washwater from the heavy metal ink)
Ted then they ~~got~~ CMH put tape around area. It was then stated they were non-hazardous & they got rid of them.

Paul asked - when wash water went through drains they were

What kind of inks now used: Flexographic water soluble ink

Waste water system: all waste water goes to sanitary sewer system (city operated) & not to ditch outside that Paul noticed on way in.

Surround land use: distance to nearest home. Ted: ½ mile down road

Paul: does anybody use ground water to drink. They don't know. But Ted said they are on city water.

Paul asked if "creek" or "drainage"? they said it is probably considered drainage ditch.

Paul asked
Are any facilities around here RCRA TSD? Nobody knew.

Are there any near by schools? Dennis: Mulebe high school is 3 miles

do 19,000 right for population? yes.

Security: nonaggressive security system. No fence just building. No guard just system

7-10-91 CMH

Is there a 2nd Shift?
Dennis said yes. 2 shifts
roughly open from 530
to 12.

James: do we get copy
of report? Paul answered
they can request it &
may have to go through
FOIA.

Paul asked if there is
evidence of storage tanks.
Ted said yes, we will see
them on the tour

11:05 meeting ended

7-10-91 CMH

-we (Paul + Cathy) wore
ear plugs + safety glasses

11:10 Tour
Manufacturing

Picture 1 floor drains in
main warehouse, at ink
press. SW orientation.

Send pictures to ~~Dept of~~ Guy Amos

Picture 2 waste baled paper for
recycling. Packages here &
shipped to recycler.
Picture 3:
Corregated (corregation) - saw drains on
floor with water N.

drums of good oils & Solvents & rack against wall of drums of waste oil & solvents

Picture 4 - NW. drum storage rack area. 5 NO Drums (Black drums on ground) Drum of waste solvent

Picture 5 - floor drain area not labeled (drm). Note: State Chemical Manufact. Co.

Picture 6 - label on solvent

Ted: Waste oil been there for years.

Ted: stated chemical waste solvent drum has been there for at least 1½ yrs.

Paul asked about any transformers on site. There is only one. NO PCB.

Weather very sunny, warm outside

UST 1 Area in back 10,000 gallon fuel oil

SE-East side of building (new boiler room.)

Picture 7 - old former SW Wastewater drum storage area

Picture 8 - location of old UST left one for fuel - right for gas. One diesel one gas Both less than 10,000.

SW corner

11:45 End of tour

ATTACHMENT D

ANALYTICAL RESULTS OF CURRENT WASH WATER

KUDUKIS WASTEWATER LABS, INC.

2779 BROADWAY AVENUE, CLEVELAND, OHIO 44115
(216) 696 - 0280 FAX: (216) 696 - 6831

ANALYSIS CERTIFIED BY: John Ondo **Laboratory Manager**

Client: Union Camp
Camp Industrial Road
Solon, OH 44139

Attn: Rick Manfredonia

Report Date: March 6, 1991
P.O. #:
Client: UNI005
Sample Received: 2/91
Lab Sample #:

Sample I.D.: #1 - 24 Hr. wastewater composite, 2/20-2/21/91
#2 - Wastewater grab, 2/21/91

ANALYSIS	#1	#2	#3	#4	ANALYSIS	#1	#2	#3	#4
Metals:	Total mg/L	—	—	—	Acidity ($CaCO_3$)				
					Alkalinity ($CaCO_3$)				
Cadmium					**Bacteria:**				
Chromium: Total					F. Coliform/100ml				
Hexavalent					T. Coliform/100ml				
Trivalent					Total Plate Count/1ml				
Copper					Chloride				
Lead	<0.05				Chlorine: T. Res.				
Nickel					Conductivity - uMHOS/cm				
Silver					**Cyanide:** Total				
Zinc					Amenable				
					Free				
Aluminum					Reactive				
Antimony					Flash Point °F				
Arsenic					Fluoride				
Barium					Hardness ($CaCO_3$)				
Beryllium					MBAS				
Calcium					**Nitrogen:** Nitrate (N)				
Iron					Nitrite (N)				
Magnesium					Ammonia (N)				
Manganese					T Kjeldahl (N)				
Mercury					Oil & Grease mg/L		22		
Potassium					**Oxygen Demand:** BOD_5				
Selenium					COD				
Silicon					**pH**				
Sodium					Phenols				
Thallium					Phosphorus: Total (P) mg/L	2			
Tin					**Residue:** Total				
					Total Volatile				
					Suspended				
					Volatile Suspended				
					Sulfate				
					Sulfide: Total				
					Reactive				

ug/L = micrograms/Liter(ppb) • mg/L = milligrams/Liter(ppm) • mg/kg = milligrams/kilogram • > = greater than • < = less than (below detection)

Sampled By: Client _____ KWLI xx D-1 Auto Sampler xx Other _____

KUDUKIS WASTEWATER LABS, INC.

2779 BROADWAY AVENUE, CLEVELAND, OHIO 44115
(216) 696 - 0280 FAX: (216) 696 - 6831

ANALYSIS CERTIFIED BY: John Ondo **Laboratory Manager**

Client: Union Camp Corp.
Camp Industrial Road
Solon, OH 44139

Attn: Rich Manfredonia

Report Date: 4/30/91
P.O. #:
Client:
Sample Received: 4/17/91
Lab Sample #:

Sample I.D.: #1 - Wastewater composite - 4/16-4/17/91
#2 - Wastewater Grab - 4/17/91

ANALYSIS	#1	#2	#3	#4	ANALYSIS	#1	#2	#3	#4
Metals:	Total Mg/L	—	—	—	Acidity ($CaCO_3$)				
Cadmium					Alkalinity ($CaCO_3$)				
Chromium: Total					**Bacteria:**				
Hexavalent					F. Coliform/100ml				
Trivalent					T. Coliform/100ml				
Copper					Total Plate Count/1ml				
Lead	<50				Chloride				
Nickel					Chlorine: T. Res.				
Silver					Conductivity - uMHOS/cm				
Zinc					**Cyanide:** Total				
					Amenable				
Aluminum					Free				
Antimony					Reactive				
Arsenic					Flash Point °F				
Barium					Fluoride				
Beryllium					Hardness ($CaCO_3$)				
Calcium					MBAS				
Iron					**Nitrogen:** Nitrate (N)				
Magnesium					Nitrite (N)				
Manganese					Ammonia (N)				
Mercury					T Kjeldahl (N)				
Potassium					Oil & Grease mg/L		27		
Selenium					**Oxygen Demand:** BOD_5				
Silicon					COD				
Sodium					**pH**				
Thallium					Phenols				
Tin					Phosphorus: Total (P) mg/L	1.9			
					Residue: Total				
					Total Volatile				
					Suspended				
					Volatile Suspended				
					Sulfate				
					Sulfide: Total				
					Reactive				

ug/L = micrograms/Liter(ppb) • mg/L = milligrams/Liter(ppm) • mg/kg = milligrams/kilogram • > = greater than • < = less than (below detection)

Sampled By: Client _____ KWLI XX Auto Sampler XX Other _____

ATTACHMENT E

ANALYTICAL RESULTS OF SOIL SAMPLES FROM UST REMOVAL

SOIL ANALYSES

SAMPLE NUMBER	1	5	6
PARAMETER			
Moisture % WET WT	22.6	17.0	19.1
Petroleumhydrocarbons UG/G-DRY	129	<33.5	56.1
Benzene UG/KG-DRY	<120	<110	<114
Ethylbenzene UG/KG-DRY	<120	<110	<114
Toluene UG/KG-DRY	<120	<110	<114
Xylenes, total UG/KG-DRY	<239	<219	<227

October 3, 1989 HNu calibration: Initial span = 5.0
Adjusted span = 4.7

October 4, 1989 HNu calibration: Initial span = 5.0
Adjusted span = 4.6

Source: White, 1989

CONTAINER DIVISION 6225 CAMP INDUSTRIAL RD., SOLON, OHIO 44139 TELEPHONE (216) 248-0125

July 29, 1982

RECEIVED 8/02/82

Ms. Kathy Homer
U.S. EPA Region V
RCRA Activities
P.O. Box A 3587
Chicago, IL 60690

Dear Ms. Homer:

Enclosed is a closure plan for Union Camp Corporation's, Solon, OH, corrugated container plant's hazardous waste storage facility.

The fifteen drums have been romoved from the storage area and disposed of in an approved hazardous waste disposal facility. I have enclosed a copy of the waste disposal manifest.

I have also notified Ms. Helen Takas of the Ohio EPA, Twinsburg office (216-425-9171) of our closure plan.

Please notify me of any further requirements we must comply to effectively remove our plant from the hazardous waste storage program.

Sincerely,

F. A. Manfredonia
Manufacturing Manager

/mpl

Note:
OHD-004-166-336
GTSD, PA

DKT

STATE OF MICHIGAN

R 4606
Rev. 2/81

WASTE DISPOSAL MANIFEST

☒ Act 64 Waste (HAZARDOUS) ☐ Act 136 Waste ☐ Other MI 0229702

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Union Camp Corporation	Browning Ferris Ind. of Mich. Inc.	Chem Met Services
Site Address	**Transporters Address**	**Facility Address**
6225 Camp Industrial Road Solon Ohio 44139	5400 Cogswell Wayne Michigan 48184	18550 Allen Rd. Wyandotte Michigan 48192
Phone Number	**Phone Number**	**Phone Number**
(216) 248-0125	(313) 729-8200	(313 282-9250
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
OHD004166336	MID053135819	MID096963194

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

GENERATOR COMPLETES — WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form: Solid	Form: Liquid	Form: Gas	Form: Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	Hazzardous Waste Liquid N.O.S	ORM-E	NA 9189	1215	Dr.								D001 D8
2.	(Waste Ink)												
3.													
4.													
5.													
6.													

COMMENTS: Include Safety precautions and special handling instructions.

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ① [signature] — Date Shipped MO. DAY YEAR: 7 9 82

TRANSPORTER COMPLETES

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. No. 1 [illegible]

Subsequent Transporter Vehicle I.D. No's

Transporter Signature ② [signature] — Date(s) Received: 07.09.82

Subsequent transporter(s) signature(s) ③

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF COMPLETES

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④ — ☐ Accepted ☐ Rejected — Date Received

Facility Site EPA I.D. Number

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

CLOSURE PLAN
HAZARDOUS WASTE STORAGE FACILITY
UNION CAMP CORPORATION
SOLON, OHIO

The hazardous waste storage facility consists of an area in the plant for the storage of metal drums containing flexographic ink washwater and sludge. The metal drums are stored on a concrete floor.

Closure will consist of removing the drums to an approved hazardous waste disposal facility by the manifest procedure. An analysis of the contents will be provided to the disposal company.

An estimate of the maximum inventory of this waste in storage is 15 drums.

The waste is the result of cleanup of printing equipment. Floor pits in which the waste was initially collected have been purged with non-hazardous washwater since discontinuing the use of inks which resulted in hazardous waste.

Any leaks or spills of hazardous waste from the drums in the storage area will be absorbed by an inert compound and stored in new drums for removal. The floor will be washed after such a cleanup.

This type of hazardous waste has not been generated since the elimination of old ink inventory in 1981. Closure is estimated to take place in 1982.

DRAFT

CONTAINER DIVISION 6225 CAMP INDUSTRIAL RD., SOLON, OHIO 44139 TELEPHONE (216) 248-0125

C. E. RAGLIN
General Manager
Cleveland

April 15, 1982

g, TSD, PA

EPA Region V
RCRA Activities
PO Box 7861
Chicago, Illinois 60680

Dear Sir:

Our corrugated box plant in Solon, Ohio submitted a Part A Hazardous Waste Permit Application in November, 1980 as a storage facility in accordance with RCRA regulations. We obtained EPA I.D. #OHD004166336. At that time the hazardous waste consisted of flexographic ink washwater and sludge which contained small amounts of lead and chromium pigments. These wastes may have exceeded the limits for these metals in the EP toxicity test.

Since that time the inks have been changed to eliminate these pigments and further testing demonstrates that the washwater and sludge is clearly not a hazardous waste by RCRA definition. We are also notifying the Ohio EPA in Columbus, Ohio.

We wish to withdraw our Hazardous Waste Permit Application for this facility based on the above change in our operation. Any hazardous waste in storage will be disposed in accordance with Ohio and EPA regulations for such disposal. Please advise if any other action is required.

Very truly yours,

C. E. Raglin

General Manager

CLOSURE PLAN
HAZARDOUS WASTE STORAGE FACILITY
UNION CAMP CORPORATION
SOLON, OHIO

The hazardous waste storage facility consists of an area in the plant for the storage of metal drums containing flexographic ink washwater and sludge. The metal drums are stored on a concrete floor.

Closure will consist of removing the drums to an approved hazardous waste disposal facility by the manifest procedure. An analysis of the contents will be provided to the disposal company.

An estimate of the maximum inventory of this waste in storage is 15 drums.

The waste is the result of cleanup of printing equipment. Floor pits in which the waste was initially collected have been purged with non-hazardous washwater since discontinuing the use of inks which resulted in hazardous waste.

Any leaks or spills of hazardous waste from the drums in the storage area will be absorbed by an inert compound and stored in new drums for removal. The floor will be washed after such a cleanup.

This type of hazardous waste has not been generated since the elimination of old ink inventory in 1981. Closure is estimated to take place in 1982.

C.2 Compliance And Enforcement

Union Camp CORPORATION

CONTAINER DIVISION
ENGINEERING AND TECHNOLOGY DEPARTMENT

1975 LAKESIDE DRIVE, SUITE 314, TUCKER, GA 30084-5865 TELEPHONE (404) 621-2215

February 12, 1990

U.S. EPA Region V
RCRA Activities
PO Box A-3587
Chicago, IL 60690

Subject: Union Camp Solon, Ohio
OH0004166336

Dear Sir:

Attached is the corrected Hazardous Waste Activity printout. If you have any questions, please feel free to contact me at (404) 621-2214.

Sincerely,

Michael P. MacDonald
Environmental Resources Mgr.

MPM/lb/B:6

Attachment

TATE OF MICHIGAN

WASTE DISPOSAL MANIFEST

☒ Act 64 Waste (HAZARDOUS) ☐ Act 136 Waste ☐ Other **MI** 022970

GENERATOR COMPLETES

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
[illegible] Comp Corporation	Browning Ferris Ind. of Mich. Inc.	Chem Met Services
Site Address: 6225 Comp Industrial Road, Solon Ohio 44139	Transporters Address: 5400 Cogswell, Wayne Michigan 48184	Facility Address: 18550 Allen Rd. Wyandotte Michigan 48192
Phone Number: (216) 248-0125	Phone Number: (313) 729-8200	Phone Number: (313) 282-9250
Generator's Site EPA I.D. Number: OHD004166336	Transporter's EPA I.D. Number: MID053335899	Facility Site EPA I.D. Number: MID096963194

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Solid	Liquid	Gas	Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Num.
1.	Hazzardous Waste Liquid N.O.S	ORM-E	NA 9189	12	15	Dr.							D0018
2.	(Waste Ink)												
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions.

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ① [signature]

Date Shipped MO. DAY YEAR: 7 9 82

TRANSPORTER COMPLETES

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. **No. 1** #127

Subsequent Transporter Vehicle I.D. No's

Transporter Signature ② [signature]

Subsequent transporter(s) signature(s) ③

Date(s) Received: 07 09 82

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF COMPLETES

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④

Facility Site EPA I.D. Number

☐ Accepted ☐ Rejected

Date Received

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

HAUL'R 1ST COPY

Union Camp CORPORATION

CONTAINER DIVISION 6225 CAMP INDUSTRIAL RD., SOLON, OHIO 44139 TELEPHONE (216) 248-0125

November 15, 1982

Mrs. Elizabeth Utley
United States EPA Region V
111 West Jackson Blvd.
Chicago, IL 60604

Dear Mrs. Utley:

Enclosed is a completed copy of the Manifest (MI0229702) you requested in your letter received by Union Camp Corporation on November 8, 1982.

It is my understanding this will complete the U.S.EPA requirement to allow our plant to be removed from your data base. I would greatly appreciate a letter from you confirming our removal from the program.

Please call me if you have any further questions.

Sincerely,

F. A. Manfredonia

/mpl

cc: B. Parry
L. Swec

STATE OF MICHIGAN

Rev. 8/81

WASTE DISPOSAL MANIFEST

☑ Act 64 Waste (HAZARDOUS) ☐ Act 136 Waste ☐ Other **MI 022970**

GENERATOR COMPLETES — IDENTIFICATION

Generator	Primary Transporter	Treatment, Storage or Disposal Facility
Generator's Name: Union Camp Corporation	Primary Transporter's Name: Browning Ferris Ind. of Mich. Inc.	Treatment, Storage or Disposal Facility: Chem Met Services
Site Address: 6925 Camp Industrial Road, Solon Ohio 44139	Transporters Address: 3400 Cogswell, Wayne Michigan 48184	Facility Address: 18550 Allen Rd., Wyandotte Michigan 48192
Phone Number: (216) 248-0125	Phone Number: (313) 729-8200	Phone Number: (313) 282-9250
Generator's Site EPA I.D. Number: [illegible]	Transporter's EPA I.D. Number: MID005338899	Facility Site EPA I.D. Number: MID096963194

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Solid	Liquid	Gas	Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	Hazardous Waste Liquid N.O.S. (Waste Ink)	ORM-E	NA9189	1 3	15	Dr.					[illegible]	[illegible]	[illegible]
2.													
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions.

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ① [signature]

Date Shipped MO. DAY YEAR

TRANSPORTER COMPLETES

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. **No. 1** [illegible]

Subsequent Transporter Vehicle I.D. No's

Transporter Signature ② [signature]

Subsequent transporter(s) signature(s) ③

Date(s) Received

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF COMPLETES

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④ [signature]

☒ Accepted ☐ Rejected

Date Received [illegible]

Facility Site EPA I.D. Number MID096963194

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

Re: DHMM
Union Camp Corporation
Cuyahoga County
02-18-0480

Union Camp Corporation
6225 Camp Industrial Road
Solon, Ohio 44139

June 28, 1982

Attn: F.A. Manfredonia

Dear Mr. Manfredonia:

On June 17, 1982, this writer met with you and Anita Carter to conduct an inspection of your facility with regard to hazardous materials management. Facility operations were also reviewed at this time to evaluate the company's request to withdraw from the hazardous waste permit system.

The hazardous waste which had been generated at the facility was the ink washwater which had high concentrations of lead and cadmium. The facility has switched to an ink with much lower concentrations of these metals. The levels of lead and cadmium now present in the washwater are below the hazardous waste criteria level. Furthermore, the ink washwater is disposed of through the City of Solon Wastewater Treatment Plant.

As a result of these changes, Union Camp Corporation in Solon is no longer a generator of hazardous wastes. At the time of my inspection, however, 14 55-gallon drums of the old ink washwater were still being stored in the hazardous waste storage area. Therefore, the inspection conducted on June 17th concerned the hazardous waste storage activities at the site.

At the time of the inspection, the facility was in general compliance with the applicable state and federal hazardous waste regulations. A copy of the inspection report is enclosed for your information. Also, a copy of the inspection report will be forwarded to U.S. EPA - Region V.

In order to withdraw from the hazardous waste permit system, the company should:

1. properly dispose of the old ink washwaters that are still in storage at the site, and

2. submit a Closure Plan for the hazardous waste storage area to both U.S. EPA and the Ohio EPA. The Closure Plan should be submitted 180 days prior to the commencement of closure.

Should you have any questions, please feel free to contact me or Kathy Homer of U.S. EPA - Region V at (312) 886-3718.

Sincerely,

Helen Takacs

Helen Takacs
Environmental Scientist
Division of Hazardous Materials Management

HT:km

Enclosure

cc: Paula Cotter, DHMM, C.O.
Peggy Vince, HWFAB, C.O.
Kathy Homer, SIP, U.S. EPA - Region V

Re: Application Number 81-HW-0480
Cuyahoga County

September 1, 1981

James Scazzard, General Manager
Union Camp Corporation
6225 Camp Industrial Road
Solon, Ohio 44139

Dear Mr. Scazzard:

On August 21, 1981, William Skowronski of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by F. A. Manfredonia.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
William Skowronski, NEDO

CERTIFIED MAIL

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD004166336

Facility: Union Camp Corporation Address: 6225 Camp Industrial Rd City: Solon

State: Ohio Zip Code: 44139 County: Cuyahoga Telephone: @216/248-0125

Facility Operator: same Title: _____ Telephone: _____

Facility Owner: Union Camp Corp. Address: 1600 Valley Road

City: Wayne State: New Jersey Zip Code: 07470 Telephone: 201/628-3000

Type of Ownership: ✓ Private _____ Government State HWFAB No. 02-18-0480

Date of Inspection: 6/17/82 Time of Inspection: (Start) 10:00 (Finish) 11:30

Advance Notification? ___ No ✓ Yes: _____

Weather Conditions: sunny, 70°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	F.A. Manfredonia	Plant Mfg. Manager	216/248-0125
2.	Anita Carter	Personnel Supervisor	216/248-0125
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Helen Takacs	Environmental Scientist	206/425-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ✓ Generation B. ✓ Storage C. ____ Treatment
   D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

   a) Listed Wastes: _____

   b) Non-Listed Wastes: ____ I (D001) ____ C (D002) ____ R (D003) ____ T (D000)

   D007, D008

3. Has this facility submitted a Part A Permit Application? ✓ Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

   ____ Yes, See Remark # ____ ✓ No

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ✓ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

manufacture of corrugated boxes

REMARKS, PART 1. (GENERAL INFORMATION)

Plant processes have been changed such that hazardous wastes are no longer being generated. However, 14 drums of old waste material are still present in the hazardous waste storage area.

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	✓			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	✓			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	✓			
a) 24-hour surveillance system.	✓			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	✓			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	✓			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	✓			

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15 and 3745-55-15)	✓			
a) Inspect emergency equipment.	✓			
b) Inspect monitoring equipment.			✓	
c) Inspect security, alarm and communication devices.	✓			inspected routinely by installer
d) Inspect process equipment (pipes, pumps, etc.).			✓	
e) Inspect containment structures (dikes, curbs, etc.).	✓			
f) Inspect facility for structural malfunctions (roof, floor, etc.).	✓			
g) Inspect hazardous waste handling/loading areas each day used.	✓			
h) Record of any malfunctions due to equipment or operator errors.			✓	
i) Record of any hazardous waste discharges.			✓	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).			✓	wastes are not ignitable or reactive

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.			✓	wastes are not ignitable or reactive
b) Physical separation of incompatible waste materials.			✓	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.			✓	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.			✓	

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	✓			
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	✓			

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).			✓	1
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			✓	

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).			✓	2
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	✓			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	✓			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			✓	

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	✓			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			

	Yes	No	N/A	Remark#
e) The present physical location of each hazardous waste within the facility.	✓			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2).			✓	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	✓			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	✓			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	✓			
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓			

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			✓	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).			✓	no shipments made to date

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).			✓	
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).			✓	
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.			✓	
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ Director within 15 days.			✓	

Subpart F: Groundwater Monitoring N/A

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.				

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.				
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.				

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	✓			
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	✓			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	✓			

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.				3
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.			✓	
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.			✓	
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).			✓	
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).			✓	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.			✓	
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.				
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.				
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.			✓	

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.			✓	

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	✓			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

1,2. Hazardous wastes are of a relatively small quantity and are neither ignitable or reactive

3. Although the entity wishes to close its storage area, the Closure Plan has not been submitted. Closure has not yet begun.

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	✓			
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	✓			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).			✓	wastes are not ignitable or reactive
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).			✓	no incompatible wastes at site

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	✓			

TATE IDENTIFICATION NUMBER
81-HW-0480

EPA IDENTIFICATION NUMBE
? OHD004166336

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

A) Facility Name: UNION CAMP CORP

B) Street: 6225 CAMP INDUSTRIAL ROAD

C) City: SOLON (D) State: OH (E) Zip Code: 44139

F) Phone: 216-248-0125 (G) County: CUYAHOGA

H) Operator: SAME

I) Street:

J) City: (K) State: (L) Zip Code

M) Phone: (N) County:

O) Owner: UNION CAMP CORP

P) Street: 1600 VALLEY ROAD

Q) City: WAYNE (R) State: NJ (S) Zip Code: 07470

T) Phone: 201-628-9000 (U) County:

V) Date of Inspection: 8-21-81 (W) Time of Inspection (From) 10:00AM (To)

X) Weather Conditions: SUNNY - 75°F

Part A
Sw

ISS
Containers

(Y) Person(s) Interviewed	Title	Telephone
F.A. MANFREDONIA	PLT. MFG. MNGR	216-248-0125
ANITA CARTER	PERSONNEL MNGR	"

(Z) Inspection Participants	Agency/Title	Telephone

(AA) Preparer Information

Name	Agency/Title	Telephone
WM SKOWRONSKI	DISTRICT ENGINEER	216-425-9171

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

___A. Storage and/or Treatment
- (1) Containers (I)
- 2. Tanks (J)
- 3. Surface Impoundments (K)
- 4. Waste Piles (L)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatm (O and P)

___E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete se IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	—	N/A
2. Facility expansion?	—	—	—	N/A
(B) General Waste Analysis: NO PLAN ON SITE				SEE REMARK #1
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	✓	—	BUT RAW INK CONTAIN. SIGNIFICANT AMOUNTS OF Cr & Pb.
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	"
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	✓	—	"
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	
2. Artificial or natural barrier around facility?	✓	—	—	
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	✓	—	—	
) Do Owner or Operator Inspections Include:				HAVE INSPECTION FORM & DO WEEKLY INSPECTIONS.
. Records of malfunctions?	✓	—	—	
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓			
5. Safety, emergency equipment?	✓			ABSORBANENT
6. Security devices?		1		N/A
7. Operating and structural devices?				N/A
8. Inspection log?	✓			
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓			
2. Job descriptions?	✓			
3. Description of training?	✓			
4. Records of training?	✓			
5. Have facility personnel received required training by 5-19-81?	✓			
6. Do new personnel receive required training within six months?	✓			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				N/A
1. Special handling?				
2. No smoking signs?				
3. Separation and protection from ignition sources?				

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			
2. Telephone or 2-way radios at the scene of operations?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			ABSORBENT

Indicate the volume of water and/or foam available for fire control:

C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			ABSORBENT VOLUME CHECK WEEKLY
2. Is emergency equipment maintained in operable conditions?	✓			
D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*Not Inspected

(E) Is there adequate aisle space for unobstructed vement?

Yes	No	NI*	Remarks
✓			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)			X	X NO CONTINGENCY PLAN AVAILABLE YET. SEE REMARK #4
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?				N/A
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	[redacted]		X	
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?			X	
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)				N/A

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?				N/A
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?				* SEE V. A. 1
2. Is coordinator familiar with all aspects of site operation and emergency procedures?				"
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?				"
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				NOT EXPERIENCED EMERGENCY YET.

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System	NO MANIFEST AVAILABLE ON SITE.			
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?				SEE ↑
2. Are records of past shipments retained for 3 years?				SEE ↑
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				SEE ↑

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	✓		
2.	Does the operating record contain the following information:			
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?		N/A	
c.	The location and quantity of each hazardous waste within the facility?	✓		
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		N/A	
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓		HOWEVER NO ANALYSIS PRESENTLY DONE. SEE REMARK #1
f.	Reports detailing all incidents that required implementation of the Contingency Plan?	✓		
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	✓		

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	✓			
2. Has this plan been submitted to the Regional Administrator		✓		NO CLOSURE ANTICIPATED
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?	✓			
Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)		✓		NO CLOSURE ANTICIPATED

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

12 DRUMS PRESENTLY

ility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
.. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)				N/A

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N/A

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

*Not Inspected

	Yes	No	NI*	Remarks
8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?				

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

L

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				

*Not Inspected

M

LAND TREATMENT

acility Name: _____ Date of Inspection: _____

1.	Is treated hazardous waste capable of biological or chemical degradation?	—	—	—
2.	Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?	—	—	—
3.	Is waste analyzed according to 265.273?	—	—	—
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	—	—	—
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	—	—	—
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	—	—	—
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	—	—	—
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	—	—	—
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies)	—	—	—

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	___	___	___	_____
**2. Collection of run-off from active portions of the fill?	___	___	___	_____
**3. Is collected run off treated?	___	___	___	_____
4. Control of wind dispersal of hazardous waste?	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	___	___	___	_____
2. Has this plan been submitted to the Regional Administrator?	___	___	___	_____
3. Has closure begun?	___	___	___	_____
4. Is closure cost estimate available by 5-19-81?	___	___	___	_____
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface the landfill?	___	___	___	_____

Inspected

INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding wa

Component	Yes	No	NI*	Remarks
1. _____	___	___	___	_____
2. _____	___	___	___	_____
3. _____	___	___	___	_____
4. _____	___	___	___	_____
5. _____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	___	___	___	_____
b. Halogen content	___	___	___	_____
c. Sulfur content	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

List other parameters for which the waste is tested to enable owner or operator to establis steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	Remarks
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
Is steady state maintained or corrections attempted?	___	___	___	_____
Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

Inspected
ecify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	—	
4. Are inspection procedures followed according to 265.403?	—	—	—	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	—	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261. or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reaso

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
A) Does the operator have copies of the manifest available for review?	—	✓	—	SEE REMARK #1
B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	—	—	—	SEE IX.1.A
2. Name, mailing address, telephone number, and EPA ID Number of Generator	—	—	—	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?				See IX.1.A
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?				
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
6. The total quantity of waste(s) and the type and number of containers loaded?				
7. Required certification?				
8. Required signatures?				
(C) Does the owner or operator submit exception reports when needed?				

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)				See IX.1.A & Remarks
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)				
(C) If required, are placards available to transporters of hazardous waste?				

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	___	___	___	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	___	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	—	—	—	SEE IX.1.A REMARK #
(B) Has the generator submitted Annual Reports and Exception Reports as required?	—	—	—	" "

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	—	—	—	N/A

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	—	—	—	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	
c. Met the Manifest requirements?	—	—	—	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	—	—	—	

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

n/a

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	—	—	—	

II. INTERNATIOINAL SHIPMENTS

n/a

	Yes	No	NI*	Remarks
A. Does the transporter record on the manifest the date the waste left the U.S.?	—	—	—	
B. Are signed completed manifest(s) on file?	—	—	—	

V. MISCELLANEOUS

n/a

	Yes	No	NI*	Remarks
A. Does transporter transport hazardous waste into the U.S. from abroad?	—	—	—	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	—	—	—	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

1. THIS FACILITY USES PRINTING INK IN THE MANUFACTURING OF CORRUGATED CONTAINERS. THE PRINTING EQUIPMENT IS WASHED BETWEEN RUNS AND IS DISCHARGED TO THE MUNICIPAL SANITARY SEWERAGE SYSTEM IN VERY DILUTE CONCENTRATION. THE COMPANY'S CORPORATE POSTURE IS TO COVER THEMSELVES IN CASE THE CITY PROHIBITS DISCHARGE TO THEM AT SOME TIME IN THE FUTURE. PRESENTLY THEY STORE 12 BARRELS OF WASH WATER ON WHICH NO ANALYSIS HAS BEEN DONE. THUS WE'RE NOT EVEN SURE THE BARRELS CONTAIN A HAZARDOUS ~~MATERIAL~~ WASTE. I TOLD THE COMPANY TO OBTAIN AN ANALYSIS AND A NUMBER OF OTHER OBVIOUS DEFICIENCIES.

IN BRIEF, I CAN'T IMAGINE THE [redacted] CIRCUMSTANCES WOULD OCCUR THAT WOULD REQUIRE THE ENTITY TO STORE H.W. ON THEIR SITE. HOWEVER THE CORPORATE OFFICE WOULD LIKE A STORAGE PERMIT TO BE SAFE.

print or type in the unshaded areas only
(areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL — EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F OHD 004166336 T/A C: 3 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP UNION CAMP CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 SCAZZARO JAMES GENERAL MANAGER	216 248 0125

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 6225 CAMP INDUSTRIAL ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 SOLON	OH	44139

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 6225 CAMP INDUSTRIAL ROAD

B. COUNTY NAME

CUYAHOGA

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 SOLON	OH	44139	035

CONTINUED FROM THE FRONT

II. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2653 (specify) Paper Converting	C 7 (specify)
C. THIRD	**D. FOURTH**
(specify)	C 7 (specify)

III. OPERATOR INFORMATION

A. NAME: UNION CAMP CORPORATION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): C A 201 628 9000

E. STREET OR P.O. BOX: 1600 VALLEY ROAD

F. CITY OR TOWN: WAYNE

G. STATE: NJ

H. ZIP CODE: 07470

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

V. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): C T I N

D. PSD (Air Emissions from Proposed Sources): C T I 9 P

B. UIC (Underground Injection of Fluids): C T I U

E. OTHER (specify): C T I 9 (specify)

C. RCRA (Hazardous Wastes): C T I R

E. OTHER (specify): C T I 9 (specify)

VI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

VII. NATURE OF BUSINESS (provide a brief description)

Manufacturer of Corrugated Paperboard Packaging

F9 A/S1

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
J. H. Neale Vice President & General Manager	J. H. Neale	11/7/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA — ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F O H D 0 0 4 1 6 5 3 6 9 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 — YR. 80 — MO. 10 — DAY 24

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. — MO. — DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.
1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C — DUP — T/A C 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	100,000 000	G		7				
2					8				
3					9				
4					10				

ontinued from the front.

III. PROCESSES (continued)

. SPACE FOR ADDITIONAL PROCESS CODES FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

. [illegible]

[illegible]	CODE	[illegible]	CODE
[illegible]	P	[illegible]	K
[illegible]	T	[illegible]	M

[illegible] unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUE ON PAGE 3

UNION CAMP CORPORATION, SOLON, OHIO

Continued from page 2.

NOTE: Photocopy this page before completing more than 26 wastes to list.

Form Approved. OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)														FOR OFFICIAL USE ONLY											
S W	O	H	D	0	0	4	1	6	6	2	3	6	T/A 3	C 1	S W	DUP					T/A 3	C 2	DUP		
1 2												12	14	15	1 2						14	15			26

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 28 / 29 - 30 / 31 - 32 / 33 - 34	
1	D 0 0 2	750,000 000	P	S 0 1	
2	D 0 0 7				INCLUDED IN ABOVE
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
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23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

ontinued from the front.

V. DESCRIPTION OF HAZARDOUS WAST[illegible] ntinued)

E. USE THIS SPACE TO LIST ADDITIONA[illegible] ROCESS CODES FROM ITEM D(1) ON PA[illegible].

. EPA I.D. NO. (enter from page 1)

0	H	D	0	0	4	1	6	6	3	3	6	F/A	C
												3	6

. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

I. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)			LONGITUDE (degrees, minutes, & seconds)		
8 1	2 7	3 0	1 4 1	2 3	5 0

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

[ ] B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C G			

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. H. Neale	J. H. Neale	11/7/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. J. Scazzaro	James J. Scazzaro	10/27/80

OU 4,AH06 4

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0480
OWNER - UNION CAMP CORPORATION
FACILITY NAME - UNION CAMP CORPORATION
FACILITY LOCATION - 6225 CAMP INDUSTRIAL ROAD, SOLON, O.
FACILITY CONTACT - JAMES SCAZZARO - GENERAL MANAGER PHONE NO. 216-248-0125
ISS INSPECTION DATE - 8-21-81

Page	COLUMN I Item No.			COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III	A	1	3745-55-12(A)	265.12 (A)			
			2					
		B	1	3745-55-13	265.13	B	✓	
			2	3745-55-13	265.13	B	✓	
			3	"	"			
		C	1	3745-55-14	265.14	B	✓	
			2	"	"			
			3	"	"			
			4	"	"			
		D	1	3745-55-15	265.15			
			2	"	"			
			3	"	"			
4			4	"	"			
			5	"	"			
			6	"	"			
			7	"	"			
			8	"	"			
		E	1	3745-55-16	265.16			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
			6	"	"			
		F	1	3745-55-17	265.17			
			2	"	"			
			3	"	"			
5	IV	A	1	3745-55-31	265.31			
		B	1	3745-55-32	265.32			
			2	"	"			
			3	"	"			
		C	1	3745-55-33	265.33			
			2	"	"			
		D	1	3745-55-34	265.34			
6		E		3795-55-35	265.35			
	V	A	1	3745-55-52	265.52	B	✓	

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
		A	2	3745-55-52	265.52	B	✓	
			3	"	"	B	✓	
			4	"	"	B	✓	
			5	"	"	B	✓	
7		B	1	3745-55-53	265.53	B	✓	
		C	1	3745-55-55	265.55	B	✓	
			2	"	"	B	✓	
			3	"	"	B	✓	
		D	1	3745-55-56	265.56			
	VI	A	1	3745-55-71	265.71	B	✓	
			2	"	"			
		B	1	3745-55-72	265.72	B	✓	
8		C	1	3745-55-73	265.73			
			2b	"	"			
			c	"	"			
			d	"	"			
			e	"	"		✓	
			f	"	"			
			g	"	"			
9	VII	A	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142			
		B	1	3745-56-09	265.118			
	VIII	I	1	3745-56-51	265.171			
			2	3745-56-52	265.172			
			3	3745-56-53	265.173			
			4	"	"			
			5	3745-56-54	265.174			
			6	3745-56-56	265.176			
10			7	3745-56-57	265.177			
			8	"	"			
		J	1	3745-56-72	265-192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265-193			
			5	3745-56-74	265.194			
			6	3745-56-78	265.198			
			7	3745-56-79	265.199			
11			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
			7	3745-57-11	265.230			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12		L	1	3745-57-31	265.251			
			2	3745-57-32	265.252			
			3		265.258			
			4	3745-57-36	265.256			
			5	"	"			
			6	3745-57-37	265.257			
			7	3745-57-37	265.257			
13		M	1	3745-57-52	265.272			
			2	"	"			
			3	3745-57-53	265.273			
			4	3745-57-56	265.276			
			5	3745-57-58	265.278			
			6	3745-57-58	265.278			
			7	3745-57-59	265.279			
			8	3745-57-61	265.281			
			9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302			
			2	"	"			
			3	"	"			
			4	"	"			
		B	1	3745-57-79	265.309			
			2	"	"			
		C	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.192			
		D	1	3745-57-82	265.312			
15				3745-55-17	265.17(b)			
		E	1	3745-57-83	265.313			
			2	3745-55-17	265.17(b)			
		F	1	3745-57-84	265.314			
			2	"	"			
			3	"	"			
			4	"	"			
		G	1	3745-57-85	265.315			
16		O&P						
	I	B	1	3745-58-33	265.373			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
	II	A	1a	3745-58-35	265.375			
			b	"	"			
			c	"	"			
17								
			2a	3745-58-35	265.375			
			b	"	"			
		B	1	"	"			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEP Use
	III	A	1	3745-58-37	265.377			
		B	1	"	"			
		C	1	"	"			
		D	1	"	"			
		E	1	"	"			
		F	1	"	"			
		G	1	"	"			
18	IV	A	1	3745-58-42	265.382			
			2	"	"			
	Q		1	3745-58-51	265.401			
			2	"	"			
19			3	3745-58-52	265.402			
			4	3745-58-53	265.403			
			5	3745-58-55	265.405			
			6	3745-58-56	265.406			
	IX I	(A)		3745-52-40	262.40	B	✓	
		(B)	1	3745-52-21	262.21	B	✓	
			2	"	"	B	✓	
20			3	"	"	B	✓	
			4	"	"	B		
			5	"	"	B	✓	
			6	"	"	B	✓	
			7	"	"	B	✓	
			8	150-42	122.5	B	✓	
		(C)		3745-52-42	262.42			
	2.	(A)		3745-52-30	262.30	B	✓	
		(B)		3745-52-31	262.31	B	✓	
		(C)		3745-52-33	262.33	B	✓	
21	3		1	3745-52-34	262.34			
			2	"	"			
			3	3745-56-54	265.174			
			4a	3745-56-72	265.192			
			b	"	"			
			c	"	"			
			d	3745-56-74	265.184			
			e	3745-56-78	265.198			
			f	3745-56-79	265.199			
22	VI	A		3745-52-40	262.40	B	✓	
		B		3745-52-41	262.41	B	✓	
	VII		1a	3745-52-50	262.50			
			b	"	"			
			c	"	"			
			2	"	"			
23	X I			3745-53-22	263.22			
	II	A		3745-53-20	263.20			
		B		"	"			
	V	A		3745-53-10	263.10			
		B		3745-53-10	"			

KEY TO CODED ITEMS (COLUMN V)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.

D. Corrective Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-12

June 28, 1991

Mr. Mike McDonald
Union Camp
6225 Camp Industrial Road
Solon, OH 44139

Re: Visual Site Inspection
Union Camp OHD 004166336

Dear Mr. McDonald:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for July 10, 1991. The inspection team will consist of Paul Wooldridge and one other employee of PRC Environmental Management, Inc., contractors for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests, or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

cc: Dave Wertz, Ohio EPA - Northeast District
David Sholtis, Ohio EPA - Columbus
Edward Kitchen, Ohio EPA - Columbus

CERTIFICATION REGARDING P' NTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Union Camp Corporation

EPA I.D. NUMBER: OHD004166336

LOCATION CITY: Solon

STATE: Ohio

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO	
° Landfill		X	
° Surface Impoundment		X	
° Land Farm		X	See Attached Letter
° Waste Pile		X	
° Incinerator		X	
° Storage Tank (Above Ground)		X	
° Storage Tank (Underground)		X	
° Container Storage Area	X		
° Injection Wells		X	
° Wastewater Treatment Units		X	
° Transfer Stations		X	
° Waste Recycling Operations		X	
° Waste Treatment, Detoxification		X	
° Other _____			

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

Flexographic ink washwater and sludge-analysis attached. 15 drums of ink washwater disposed of July 9, 1982; drum storage - 75' x 75' - site plan attached

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

No release ever occurred from this site.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

F. A. Manfredonia - Manufacturing Manager
Typed Name and Title

F. A. Manfredonia
Signature

2-27-86
Date

7/20/89 (1)

arrived @ 9:AM overcast
70°F

Mete in conference room

Union Camp purchase 1970
since a tall oil processor
wanted to up grade
use to burn as fuel
core of faculty was fatty acid -

UC added dimer equip
cook up to 500
separate monomer
from dimer acids
for export + domestic
consumption

Up grade is to polyamide resins
end up in adhesive ink is
curing agents some epoxy paints
some resins mixed with solvents
(print inks) use solvent-toluene

- try to utilize all by products — (2)

tall oil from savannah
castor oil from brazill Cr.
Palm oil from malaysia
tallow from rendering plants
sep not compet. ∴ hydrogenation

TALL oil / byproduct of paper mill
Linoleic acids C18 fatty acids
fatty acid seperated from rosin
sludges on dr.
wet 15% water

steam the press to get oil
little plus

mono acids ~~ar~~ sat acids goes back to solvent process.

Iso acids are sol in acids

Rubber grade

burn as pitch (fuel)

sometimes make or buy dimer

(3)

glycols + butylene glycol adipic acids for esterification process.

Air PC equip
caustic fusion lines

~~Str~~ water goes to process

~~outfall 004 sealed of~~ 85-87 [illegible]

have 5-6 wells for process
city provid water
wells for process

non-contact water 8 mil / day

½ water direct contact

thev neutral does not imply automatic

toluene is dissolved into ink resins
goes out to product.
recycle from cloth.

(4)

mid 1920 + smoke stack
penns battery case 1930 for
Ford. bakelite cases
vacant for 5-7 yrs 1932
W.C. Hardesty – fatty acids
used tallow process
@ 1950 Wallace + Tiernan
merge w/ Pennsalt → Pennwalt
Late 1960s

then [illegible] Camp
Fatty 30's
ester started in 40's
[illegible] mid 70s

prev – River
East 1962 and after
two alcohol tanks
x will try to get well logs

intercept source priority pollutant analysis
for river seepage
BOD + COD
from leaks in industrial sewer
rebuilt drainage system
collect water in sump

River bank soil removed and sampled
di-butylphthalate
Ident. as Landfill 'A'

OEPA said okay to landfill
but Landfill wants to see doc.

(5)

Ni + palladium
bo collect as much as possible due to
value.

1973 may have been Ox deficient
up stream 2 steel mills + power
plant. According to facility not them
no fines or action

2130 started tour

use 4 [illegible] /yr

is ship/recv [illegible] / [illegible]
[illegible] bag [illegible]

[illegible] to [illegible] + cool down

the nitrogen generator burn to
make CO_2 etc
absorb water
nitrogen used to
blanket tanks

fatty acid or waste

Photo Roll 1

Q1 P1 sump
Fatty acid collection sump
vacuum off gate reclaimed

(P2) Fatty Acid pool

(P3) view of Nickel Reclaimer

(P4) view decanting / hydro sump
Fatty acids
tank is rear of feed tanks

209 tank methanol, no above

two distillation @ 30 ft ab.
bases have sumps
use dow therm as heat transfer
water is vaporized
all reclaimed
process manned by control panel

off spec recycled drums
movement is haz at hydrogenated

After hydrogenation filter at reclaimer
nickel

Sump goes to collection pit

most product & feed tanks 12000 gal

hydrogenation 500 psi
@ 4 500°F

vacuum system to acid and hydration

decant fat off sump
offline

(8)

(P-5) unload area

(6) tall oil Rail Car unloading ~~ABSAT~~

(7) earthen tank dike

(8) dumpster

(9) Dimer Sump (sump 10)

(9)

hydrogenate drain in loading Area

unload BKS of tall oil

Drain goes to daily waste line

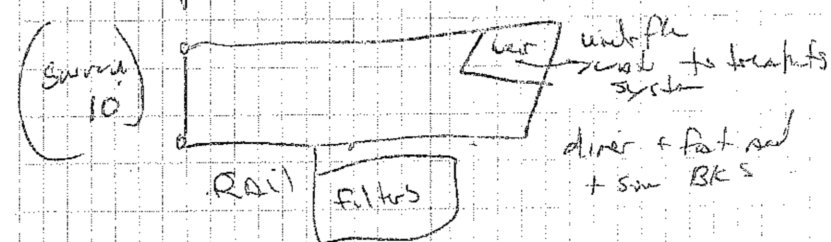
Ammonia scrubber used in emergency

Rad level detector

All sump goes to Neutral waste line
cool water for Acid treat area

BKS react filter sent to intermediate
storage Schedule upper scrubber

pump goes back to process



(10) view of Dimer hop unload

(11) (Swmu 33)

(12) (11) Peletize trench

make photos ... b/2

(13) (Swmu 1)

(14) (AOC F)

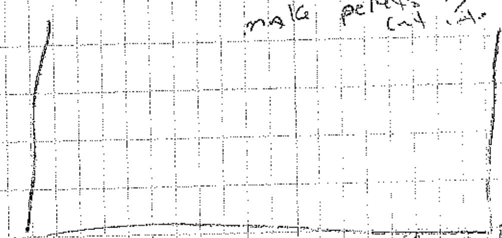
(15) (Swmu 8)

Dimer Clay hopper waste hopper
unload Area

T6 daily process

waste dim yeast scps
thr + Swmu 12

trench is peletize trench
make pellets by waste extruder
cut into pellets



trench is inside bldg

(3:15)

~~Yellow~~ line demarked (Swmu I)

next → (AOC F)

solvent + non haz waste
solvents GSX [haz sol line blowing]

(12)

16 Line blowing down AA

17 Solvent Berm

18 " "

19 Ready

21 Swap pile

22 HAZ storage Area

23 > sump

24 >

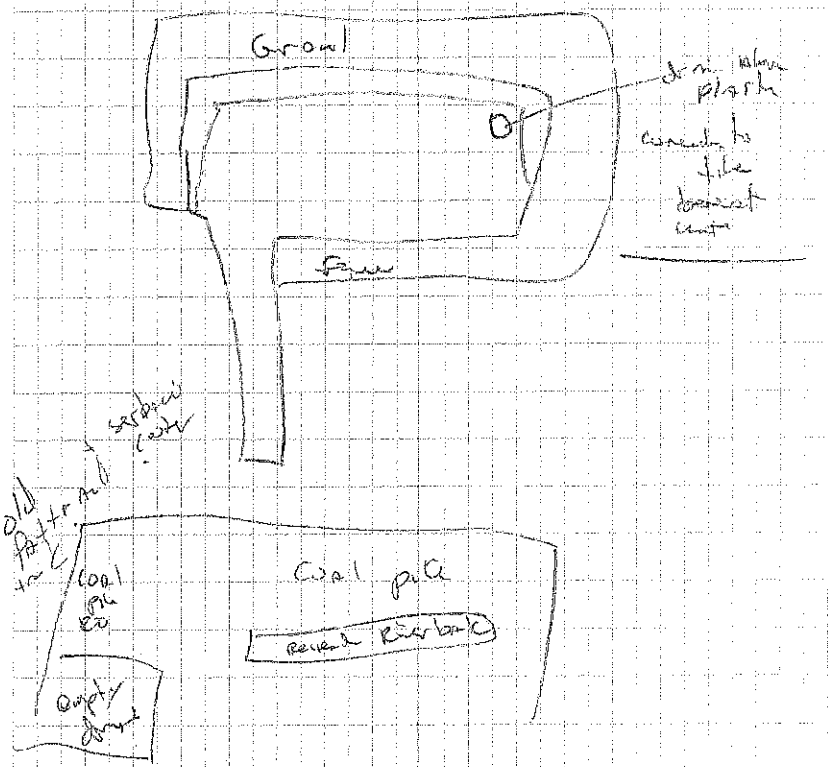
25 Overview

26 Backyard

(13)

always door this depth or bed

Solvent storage berm Area



(27) River bed photo

(28) drums

(29) swale look west

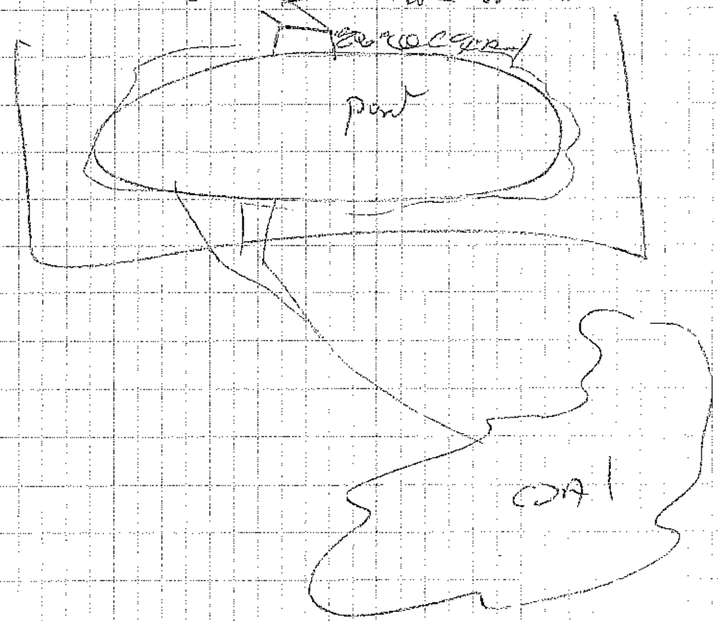
(30) view of pond NW

(31) (see 26)

(32) tank 132

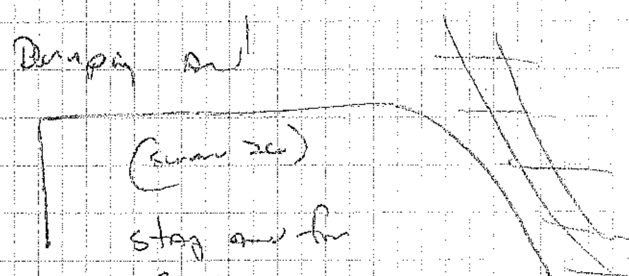
(33) no ditch

use soda ash so water goes
to River etc over top



Drum Dumping area!

[illegible]



stop area for
for emergency

2 (34) (Swmu 11)

2 (35) Tank 752

20 (36) Sump for #2 distill Area

25

Roll 1

3 (37) (Swmu 33 + 34)

cool wash
unloadin
AREA

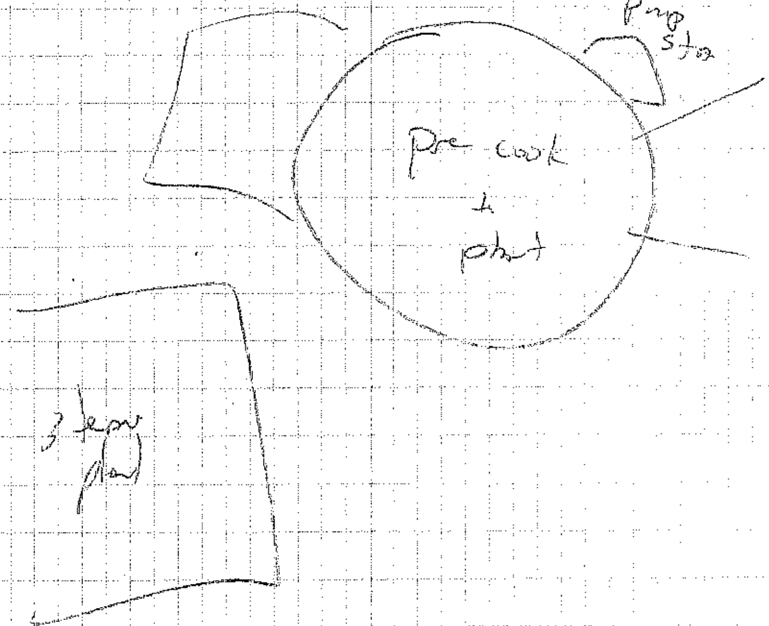
Roll 2

3 (1) (Swmu 33 + 34)

(2) Dust collect
(Swmu 34)

(3) Dust collector + pneumatic tubes

(4) hopper of (Swmu 33)



4 pm

(18)

(2) (5) sump for trails under [illegible]

(2)

(6) slip show [illegible]
Flood of 1913
Rail car

(20)

(20) (7) [illegible] all pitches
from [illegible]
for [illegible]

(3)

(3) (8) Leaker see [illegible]
([illegible])
[illegible]

(9)

Overland of [illegible] (all [illegible])

(19)

(2) (10) Summ AOC D + 14

(2) (11) (Summ 24) backgrd
reman
Abbasto

(20)
drms bc
curs rubbh

(3) (12)
G the boosn
(3) (13) 2 3rd born
(3) (14)

(15) weeks song (AOC L)

(16) fite poss fr worker cake
(17)

(20)

4/30 Serbasu ph awl

sebasu aw'd
goal build, blocks

(21)

(18) Thermal Ox Leak Area
(AOC O)

(19) Dumpster for carbon filter
goes to landfill

(20) UST converted to Above ground

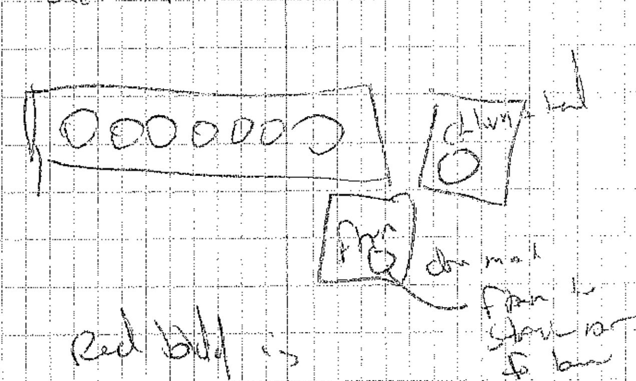
plb (23) (AOC P)

(24) Primary clarifier

(25) Associated w/ prep
poly bathes

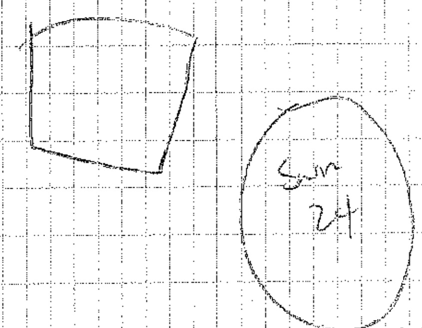
(22)

Rock Rea mat



Red bldg is
fire tank

5125 WWTP



(2)

(2)

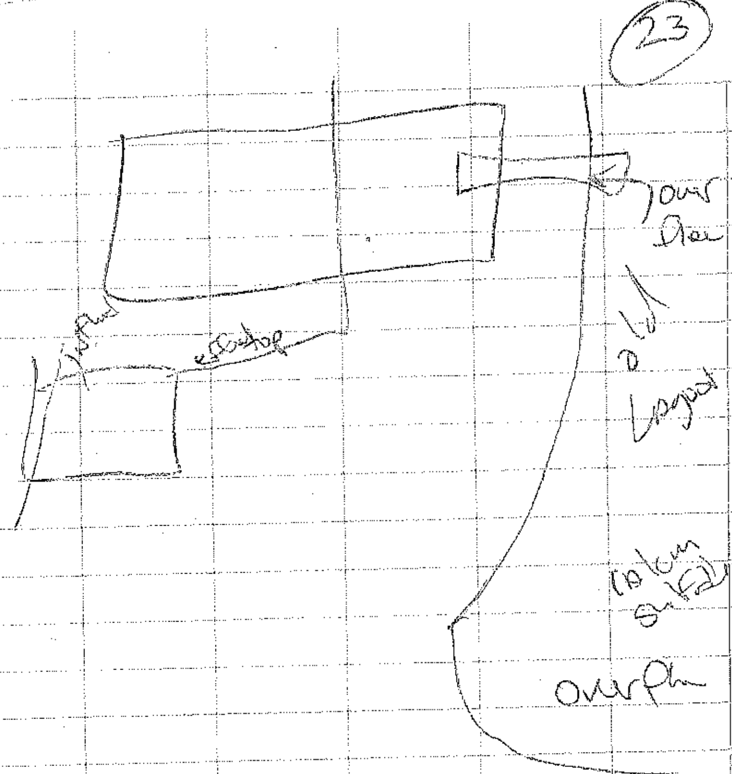
(20)

~~(20)~~

(3)

(3)

(3b)



(28) – ~~(Sump 19)~~ Old wastewater lag

(29) – Abandon Landfill B

(30) – Sludge withdrawal pipes
dripping noted by inspector
Lo swan hist of Ebert

(31) Sump for Runoff
in vicin
of
prim
clarif

(32) Sludge roll off hopping

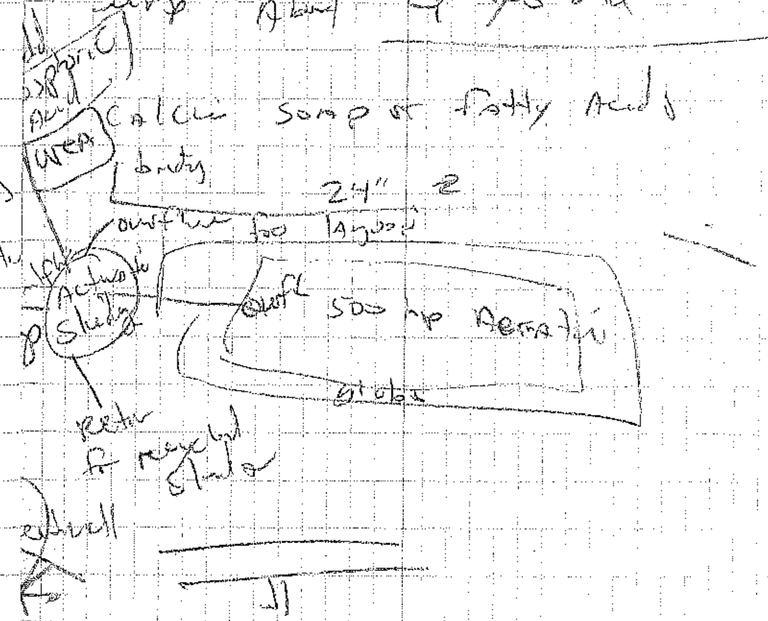
(33) sludge line leak
for last
yrs show
(swan 25)

(34) (Swan 25)

(1)
(2) > Sump to clearwell

Sump About 4 yrs old

Calcium soap or fatty acids



(3) clear well

(4) pump

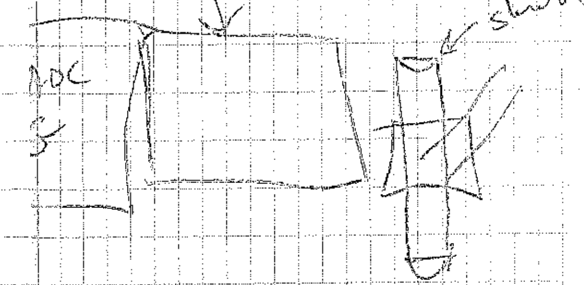
(5) polymer gel mix tank

(6) G

(7) → G ADC

basin - pumps + clarifier
activated sludge unit
2 week old

gel mix tank (



overflow to clarifier
cake to dumpster

6 pm

debriefing

Roll 3

(11) Abandoned Line Neutral —

CAll Abandoned

AOC M + N

Left W C

@ 6:45

[illegible signature]